

Regional Planning Commission Transmittal Checklist

Hearing Date
January 7, 2015
Agenda Item No.
6

Project Number: R2013-03397-(5)
Case(s): Conditional Use Permit Case No. 201300170
Environmental Assessment Case No. 201300290
Planner: Anthony Curzi

- ☒ Project Summary
- ☒ Property Location Map
- ☒ Staff Analysis
- ☐ Draft Resolution / Draft Ordinance / 8.5x11 Map (ZC or PA)
- ☒ Draft Findings
- ☒ Draft Conditions
- ☒ Burden of Proof Statement(s)
- ☒ Environmental Documentation (MND)
- ☒ Correspondence
- ☒ Photographs
- ☒ Aerial Image(s)
- ☒ Land Use/Zoning Map
- ☐ Tentative Tract / Parcel Map
- ☒ Site Plan / Floor Plans / Elevations
- ☐ Exhibit Map
- ☐ Landscaping Plans
- ☒ Hearing Examiner Transcript

Reviewed By: 



Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

PROJECT NUMBER

R2013-03397-(5)

HEARING DATE

January 7, 2015

REQUESTED ENTITLEMENTS

Conditional Use Permit No. 201300170

Environmental Assessment No. 201300290

PROJECT SUMMARY

OWNER / APPLICANT

Antelope Valley Solar LLC / Antelope Valley Solar LLC

MAP/EXHIBIT DATE

November 21, 2014

PROJECT OVERVIEW

The applicant, Antelope Valley Solar LLC, request a conditional use permit to authorize the construction, operation, and maintenance of a 7.45-megawatt photovoltaic solar energy facility ("electric generating plant") in two phases in the A-2-1 (Heavy Agricultural – One Acre Minimum Required Lot Area) Zone in the east Antelope Valley and to allow a 7- to 8-foot fence around the perimeter of the Project Site. The project will employ either fixed-tilt or single-axis tracking solar systems on steel support structures.

The facility will also contain appurtenant facilities such as internal access roads, a meteorological data collection system, retention basins and water tank(s) for fire protection. Landscaping and/or screening are proposed along 90th Street East and the northern and southern 500-foot portions of 87th Street East.

LOCATION

Southwest corner of East Avenue F and 90th Street East

ACCESS

East Avenue F and 90th Street East

ASSESSORS PARCEL NUMBER(S)

3307-016-012, 3307-016-013

SITE AREA

72 Net Acres

GENERAL PLAN / LOCAL PLAN

Antelope Valley Areawide General Plan

ZONED DISTRICT

Antelope Valley East

LAND USE DESIGNATION

Non-Urban 1 (N1)

ZONE

A-2-1

PROPOSED UNITS

NA

MAX DENSITY/UNITS

NA

COMMUNITY STANDARDS DISTRICT

NA

ENVIRONMENTAL DETERMINATION (CEQA)

Mitigated Negative Declaration (MND) with impacts to Aesthetics, Air Quality, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, and Utilities/Service Systems all reduced to less than significant with mitigation measures.

KEY ISSUES

- Consistency with the Los Angeles County General and Antelope Valley Areawide General Plans
- Satisfaction of the following Sections of Title 22 of the Los Angeles County Code:
 - 22.56.040 (Conditional Use Permit Burden of Proof Requirements)
 - 22.24.150 (A-2 Zone Uses Subject to Permits)
 - 22.24.170 (A-2 Zone Development Standards)

CASE PLANNER:

Anthony Curzi

PHONE NUMBER:

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E-MAIL ADDRESS:

acurzi@planning.lacounty.gov

ENTITLEMENTS REQUESTED

- Conditional Use Permit (CUP) for the construction, operation, and maintenance of a photovoltaic solar energy facility ("electric generating plant") in the A-2-1 (Heavy Agricultural – One Acre Minimum Required Lot Area) Zone pursuant to Los Angeles County ("County") County Code Section 22.24.150 and for a modification to allow a 7- to 8-foot fence around the perimeter of the Site.

PROJECT DESCRIPTION

The applicant, Antelope Valley Solar, LLC, requests a CUP to authorize the construction, operation, and maintenance of a maximum 7.45-megawatt photovoltaic solar energy facility ("Project") on a net 72-acre property located on the southwest corner of Avenue F and 90th Street East in the unincorporated community of Roosevelt in the east Antelope Valley. The Project would be developed in two phases: Phase 1 would be located on the northern part of the property and would produce 4.45 megawatts, and Phase 2, if constructed, would be located on the southern part of the property and would produce the remaining 3 megawatts. The applicant currently only has a Power Purchase Agreement for Phase 1.

Solar panel technology would be either fixed-tilt (approximately 6 feet tall) or single-axis tracking systems (approximately 8 feet tall). Other Project components include: (1) an electrical collection and inverter transformer system, (2) a meteorological data collection system, (3) on-site roads, driveways, and retention basins, and (4) one or two water tank(s) for use by the Fire Department.

Perimeter landscaping and/or fence screening is proposed along 90th Street East, and along the northern and southern 500-foot portions of 87th Street East. The entire facility will be surrounded by a 6-foot chain-link fence topped with 1 to 2 feet of barbed wire. An interconnection to the electrical grid will be made to Southern California Edison's (SCE) electrical power lines near the Project's eastern boundary. Construction for the Project will entail 28,400 cubic yards of grading (total for Phases 1 and 2).

SITE PLAN DESCRIPTION

The site plan for the Project depicts the rectangular-shaped property, approximately 1,200 feet wide by 2,600 feet deep. Solar arrays comprise the majority of the site. Near the entrances to the Project Site (on East Avenue F and East Avenue F-8) are located the Fire Department water tanks. Fire/service access roads and equipment pads are also depicted on the site plan.

EXISTING ZONING

The subject property is zoned A-2-1.

Surrounding properties are zoned as follows:

North: A-2-1

South: A-2-1

East: C-3 (Unlimited Commercial)

West: A-2-1

EXISTING LAND USES

The subject property is currently undeveloped.

Surrounding properties are developed as follows:

North: Vacant land

South: Vacant land

East: Vacant land, industrial parking lot

West: Single-family residence, vacant land

PREVIOUS CASES/ZONING HISTORY

Ordinance No. 7490 established the A-2-1 Zone on the subject property on March 17, 1959. Ordinance No. 7450 established the A-2-2 (Heavy Agricultural – Two Acre Minimum Required Lot Area) Zone on the subject property on December 16, 1958. Ordinance No. 7093 established the M-3 (Unclassified) Zone on the subject property on January 2, 1957

ENVIRONMENTAL DETERMINATION

The County Department of Regional Planning recommends that a Mitigated Negative Declaration is the appropriate environmental documentation under the California Environmental Quality Act (CEQA) and the County environmental guidelines. The Initial Study concluded that there are certain potentially significant environmental impacts associated with the Project that can be reduced to less than significant with the implementation of the proposed mitigation measures. The draft Mitigation Monitoring Program is included as an attachment to this report.

The areas of environmental impact found to be less than significant with Project mitigation incorporated include the following:

- Aesthetics – Mitigation measures include landscaping and/or screening along perimeter fencing and establishing downward-focused lighting.
- Air Quality – Mitigation measures include establishing a Dust Control Plan with multiple dust control strategies.
- Biota – Mitigation measures include conducting pre-construction surveys, provide worker education regarding potential on-site species, and payment of an in-lieu fee to an organization that assists in the preservation of burrowing owls and Swainson's hawk.
- Cultural Resources – Mitigation measures include following proper protocol regarding the discovery of archaeological/paleontological resources and human remains.
- Hazards and Hazardous Materials – Mitigation measures include preconstruction soil testing and compliance with applicable regulations.
- Utilities and Service Systems – Mitigation measures include submittal and approval of a Recycling and Reuse Plan to the County.

STAFF EVALUATION

General Plan/Community Plan Consistency

The Project site is located in the N1 land use category of the Antelope Valley Areawide General Plan ("Community Plan"). This land use designation is intended for low-density and low-intensity uses such as low-density residential land uses. (The N1 designation permits 0.5 dwelling units per acre.)

The proposed use is not a residential project; however, the Community Plan allows for utility uses and non-residential uses in rural areas provided certain conditions are met. These include a public hearing process which shall impose appropriate conditioning for the Project to ensure that negative impacts on adjacent land uses are minimized. This Project will go through the public hearing process and conditions have been adopted to ensure that impacts are minimized. Furthermore, an environmental review has been performed and mitigation measures have been identified that further reduce the environmental impacts of the Project.

The Community Plan provides further guidelines for the development of non-residential uses in non-urban areas. These guidelines specify that the location, access, and design of the proposed use are compatible with the community's rural character and will not have negative impacts to surrounding uses. The location, access, and design of the proposed Project are all compatible with the surrounding area, making the Project appropriate for the area.

The photovoltaic solar energy facility is a largely passive utility-type use that is unobtrusive in its operation and maintenance and is therefore consistent with the permitted uses of the underlying land use categories.

The following policies of the General Plan are applicable to the proposed Project:

- *General Goals and Policies Chapter – Land Use and Urban Development Pattern – Policy 23 (Page I-21): "Ensure that development in non-urban areas is compatible with rural lifestyles, does not necessitate the expansion of urban service systems, and does not cause significant negative environmental impacts or subject people and property to serious hazards."*

The proposed photovoltaic solar facility will be designed in a manner that is compatible with the rural lifestyle in the area. It is located on former farmland adjacent to SCE electrical power lines. It will be a largely passive utility-type use and will require little maintenance. It will be screened from public view with potential perimeter landscaping and fence fabric coverings. The Project will not cause significant negative environmental impacts, nor will it subject people or property to serious hazard because measures have been adopted in the conditions to ensure that risks from fugitive dust will be reduced.

- *General Goals and Policies Chapter - Area Development Priorities – Policy 61 (Page I-31): "Maintain the open and rural character of the non-urban areas of the Antelope Valley."*

The Project site is an area that is considered rural. It is surrounded by vacant land, scattered residences, and farmland. The proposed Project would essentially preserve the rural character of the community by developing a low-intensity land use on the property. The majority of the acreage of the fenced area of the solar array would be undisturbed as only approximately 10 percent of the site would be graded, and the development that is proposed is modest in its scale and use. The applicant will be required to provide an in-lieu fee to a non-profit organization that assists in the preservation of burrowing owl habitat.

- *Conservation and Open Space Chapter – Needs and Policies – Policy 2 (Page II-26): “Support the conservation of energy and encourage the development and utilization of new energy sources including geothermal, thermal waste, solar, wind and ocean-related sources.”*

The Project is for a photovoltaic solar energy facility that will generate 7.45 megawatts of renewable energy.

- *Conservation and Open Space Chapter – Needs and Policies – Policy 3 (Page II-26): “Promote the use of solar energy to the maximum extent possible.”*

The Project is for a photovoltaic solar energy facility that will generate 7.45 megawatts of renewable energy.

The following policies of the Community Plan are applicable to the proposed Project:

- *Policy 19 (Page V-3): “Minimize disruption and degradation of the environment as land use development occurs, integrating land uses so that they are compatible with natural environmental systems.”*

The Project minimizes grading to the site. Grading will only occur for access roads, retention basins, and water tanks.

- *Policy 40 (Page V-6): “Encourage efficient utilization of resources in allocation of land to various uses, and incorporate energy conservation measures into the design and implementation of public and private projects.”*

The Project will generate 7.45 megawatts of carbon-free energy, reducing greenhouse gas emissions and allowing the State to meet its goals to reduce global climate change. The Project will also minimize ground disturbance and puts modest demands on public infrastructure.

Zoning Ordinance and Development Standards Compliance

The Project is considered an electric generating plant, which is a conditionally permitted use in the A-2 Zone. The Project, furthermore, meets all zoning regulations regarding setbacks and the applicant is requesting a modification to fence heights to permit a 7- to 8-foot fence around the perimeter of the Site. This modification is appropriate as it will allow the fence to be the same height all around the Project Site.

Site Visit

Staff, including the Project planner and the staff biologist, visited the Project site on April 22, 2014.

Burden of Proof

The applicant is required to substantiate all facts identified by Section 22.56.040 of the County Code. The Burden of Proof with applicant's responses is attached. Staff believes that the applicant has met the burden of proof.

The Project's land use designation is N1 (Non-Urban 1). The N1 designation is intended for low-density residential uses of a maximum of 0.5 dwelling units per acre. The proposed use is not a residential project; however, the Community Plan allows for utility uses and non-residential uses in rural areas provided certain conditions are met. These include a public hearing process, which shall require appropriate conditioning of the project to ensure that negative impacts on adjacent land uses are minimized. This Project has gone through the public hearing process and conditions have been adopted to ensure that impacts are minimized. Furthermore, an environmental review has been performed and mitigation measures have been identified that further reduce the environmental impacts of the Project.

The Community Plan provides further guidelines for the development of non-residential uses in non-urban areas. These guidelines specify that the location, access, and design of the proposed use are compatible with the community's rural character and will not have negative impacts to surrounding uses. As the Project will be a low-intensity, largely passive utility use appropriately located on disturbed land, will have adequate access to well-maintained and sufficiently wide streets, will be attractively landscaped and screened at its perimeter, and will be appropriately fenced with wildlife-friendly fencing, it is appropriate for the subject location.

Therefore, the Commission finds that the proposed use with the attached conditions will be consistent with the adopted general plan for the area.

The requested use is a largely passive utility use. It will not interfere with others quiet enjoyment of their property. The photovoltaic facility will contain rows of solar panels with a maximum height of 8 feet. One or two water tanks for a total of 10,000 gallons of water, painted in earth tone colors and with a maximum height of approximately 18 feet, will also be located on the Project site. The Project will be screened from view by landscaping and/or fabric on the perimeter fence along 87th Street East and 90th Street East. The fence will be 6 feet tall and topped with 1 to 2 feet of barbed wire. A Dust Control Plan will ensure that fugitive dust from the construction and operation of the Project will be minimized.

Therefore, the Commission finds that the requested use at the location proposed will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not

jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

Neighborhood Impact/Land Use Compatibility

The proposed Project will comprise a photovoltaic solar energy facility on approximately 72 net acres producing a maximum 7.45 megawatts in two phases. The Project Site is in a rural area with the nearest residence located immediately to the west. A dairy farm is located approximately 0.75 miles to the east.

The property's vegetation consists mostly of low-growing desert scrub. SCE power lines are located in the vicinity of the Project Site.

COUNTY DEPARTMENT COMMENTS AND RECOMMENDATIONS

The County Department of Public Works ("Public Works") recommends approval of this Project and has recommended conditions of approval, which are included in the Project's conditions. The County Fire Department ("Fire Department") recommends approval of this Project and has recommended conditions of approval, which are included in the Project's conditions. The County Public Health Department ("Public Health") recommends approval of the Project and has recommended conditions of approval, which are included in the Project's conditions.

OTHER AGENCY COMMENTS AND RECOMMENDATIONS

The California Department of Transportation (Caltrans) submitted a letter stating that oversize transport vehicles on State highways would require a permit, and that the Project should be mindful not to discharge stormwater onto highways. The Antelope Valley Air Quality Management District (AVAQMD) submitted a letter stating they concur with the air quality analyses and the dust control strategies for the Project. The California Department of Fish and Wildlife (CDFW) submitted a letter stating: (1) that they are concerned with the impacts of solar arrays on avian species, (2) that the biological mitigation measure concerning burrowing owl be slightly modified, (3) that additional mitigation measures for the desert kit fox be incorporated into the MND, (4) that the County mitigate for the loss of Swainson's hawk, and (5) that the Decommissioning Plan be circulated for public review and comment. Responses to all these comments are found in the Final MND.

LEGAL NOTIFICATION AND PUBLIC OUTREACH

Pursuant to the provisions of Sections 22.60.174 and 22.60.175 of the County Code, the community was appropriately notified of the public hearing by mail, newspaper, property posting, library posting, and Regional Planning website posting.

PUBLIC COMMENTS

A Hearing Examiner Public Hearing was held in the Roosevelt community on December 11, 2014. Approximately 20 members of the public attended and six testified. Issues raised by the public included: perimeter landscaping and visual screening of the facility, dust control, water usage, effectiveness of zoning enforcement in addressing violations the Project may have if approved, proximity to a dairy farm located to the east of the Project Site, questions about the Transition Habitat Conservancy (a non-profit that the

applicant will make a donation to for burrowing owl protection), and better notification of the Town Council for the area (Roosevelt).

FEES/DEPOSITS

If approved, fees identified in the attached Project conditions will apply unless modified by the Regional Planning Commission.

STAFF RECOMMENDATION

The following recommendation is made prior to the public hearing and is subject to change based upon testimony and/or documentary evidence presented at the public hearing:

Staff recommends **APPROVAL** of Project Number R2013-03397-(5), Conditional Use Permit Number 201300170, subject to the attached conditions.

I MOVE THAT THE REGIONAL PLANNING COMMISSION CLOSE THE PUBLIC HEARING AND ADOPT THE MITIGATED NEGATIVE DECLARATION PURSUANT TO STATE AND LOCAL CEQA GUIDELINES.

I MOVE THAT THE REGIONAL PLANNING COMMISSION APPROVE CONDITIONAL USE PERMIT NUMBER 201300170 SUBJECT TO THE ATTACHED FINDINGS AND CONDITIONS.

Prepared by Anthony Curzi, Regional Planning Assistant II, Zoning Permits North Section

Reviewed by Paul McCarthy, Supervising Regional Planner, Zoning Permits North Section

Attachments:

Draft Findings, Draft Conditions of Approval

Applicant's Burden of Proof statement

Correspondence

Environmental Document

Site Photographs, Aerial Image

Site Plan, Land Use Map

PMC: AMC

December 22, 2014

**DRAFT FINDINGS OF THE REGIONAL PLANNING COMMISSION
AND ORDER
COUNTY OF LOS ANGELES
PROJECT NO. R2013-03397-(5)
CONDITIONAL USE PERMIT NO.201300170**

1. The Los Angeles County ("County") Regional Planning Commission ("Commission") conducted a duly-noticed public hearing in the matter of Conditional Use Permit No. 201300170 ("CUP") on January 7, 2015. The County Hearing Examiner also conducted a duly-noticed public hearing on the draft environmental document (Mitigated Negative Declaration [MND]) on December 11, 2014.
2. The permittee, Antelope Valley Solar LLC. ("permittee"), requests the CUP to authorize the construction, operation, and maintenance of a photovoltaic solar energy facility ("electric generating plant" or "Project") on a property located at the southwest corner of East Avenue F and 90th Street East, comprised of two parcels (Assessor's Parcel Numbers [APNs] 3307-016-012 and 3307-016-013), in the unincorporated community of Roosevelt ("Project Site") in the A-2-1 (Heavy Agricultural – One Acre Minimum Required Lot Area) Zone pursuant to Los Angeles County Code ("County Code") section 22.24.150. Also requested is a modification of fence height to allow a 7- to 8-foot fence around the perimeter of the Project Site.
3. The Project is on a net 72-acre property located on the southwest corner of Avenue F and 90th Street East in the unincorporated community of Roosevelt in the east Antelope Valley. The Project would be developed in two phases: Phase 1 would be located on the northern part of the property and would produce 4.45 megawatts, and Phase 2, if constructed, would be located on the southern part of the property and would produce the remaining 3 megawatts. The applicant currently only has a Power Purchase Agreement for Phase 1.

Solar panel technology would be either fixed-tilt (approximately 6 feet tall) or single-axis tracking systems (approximately 8 feet tall at its highest point). Other Project components include: (1) an electrical collection and inverter transformer system, (2) a meteorological data collection system, (3) on-site roads, driveways, and retention basins, and (4) one or two water tank(s) for use by the Fire Department.

Perimeter landscaping and/or fence screening is proposed along 90th Street East, and along the northern and southern 500-foot portions of 87th Street East. The entire facility will be surrounded by a 6-foot chain-link fence topped with 1 to 2 feet of barbed wire. An interconnection to the electrical grid will be made to Southern California Edison's (SCE) lines near the Project's eastern boundary. Construction for the Project will entail 28,400 cubic yards of grading (total for Phases 1 and 2).

4. The Project Site is 80 gross acres (72 net acres) in size and consists of two legal lots. The Project Site is rectangular in shape with gentle-sloping topography and is currently undeveloped.

5. The Project Site is located in the Antelope Valley East Zoned District and is currently zoned A-2-1.
6. The Project Site is located within the N1 (Non-Urban 1) land use category of the Antelope Valley Areawide General Plan ("Community Plan") Land Use Policy Map.
7. Surrounding Zoning within a 500-foot radius includes:
 - North: A-2-1
 - South: A-2-1
 - East: C-3 (Unlimited Commercial)
 - West: A-2-1
8. Surrounding land uses within a 500-foot radius include:
 - North: Vacant land
 - South: Vacant land
 - East: Vacant land and industrial parking lot
 - West: Vacant land and single-family residence
9. Ordinance No. 7490 established the A-2-1 Zone on the subject property on March 17, 1959. Ordinance No. 7450 established the A-2-2 (Heavy Agricultural – Two Acre Minimum Required Lot Area) Zone on the subject property on December 16, 1958. Ordinance No. 7093 established the M-3 (Unclassified) Zone on the subject property on January 2, 1957.
10. The site plan for the Project depicts the rectangular-shaped property, approximately 1,200 feet wide by 2,600 feet deep. Solar arrays comprise the majority of the site. Near the entrances to the Project Site (on East Avenue F and East Avenue F-8) are located the Fire Department water tanks. Fire/service access roads and equipment pads are also depicted on the site plan.
11. The Project Site is accessible via East Avenue F to the north and East Avenue F-8 to the south. Primary access to the Project Site will be via a 20-foot-wide entrance/exit on East Avenue F for Phase 1 of the Project and East Avenue F-8 for Phase 2 of the Project.
12. In December 2014, prior to the Commission's public hearing on the Project, the permittee met with the Roosevelt Town Council to discuss Project characteristics. At the request of the Town Council, the permittee agreed to include fence screening in the aesthetic mitigation measure to further mitigate the visual impacts of the Project.
13. The County Department of Public Works ("Public Works") recommends approval of this Project and has recommended conditions of approval, which are included in the Project's conditions. The County Fire Department ("Fire Department") recommends approval of this Project and has recommended conditions of approval, which are included in the Project's conditions. The County Public Health Department ("Public

Health”) recommends approval of the Project and has recommended conditions of approval, which are included in the Project’s conditions.

14. Prior to the Commission’s public hearing on the Project, an Initial Study was prepared for the Project in compliance with the California Environmental Quality Act (Public Resources Code section 21000, et seq.) (“CEQA”), the State CEQA Guidelines, and the Environmental Document Reporting Procedures and Guidelines for the County. Based on the Initial Study, Regional Planning staff determined that a MND was the appropriate environmental document for the Project. The mitigation measures necessary to ensure the Project will not have a significant effect on the environment are contained in the Mitigation Monitoring and Reporting Program (“MMRP”) prepared for the Project.
15. Pursuant to the provisions of sections 22.60.174 and 22.60.175 of the Zoning Code, the community was appropriately notified of the Project’s public hearings by mail, newspaper, and property posting.
16. A Hearing Examiner Public Hearing was held in the Roosevelt community on December 11, 2014. Approximately 20 members of the public attended and six testified. Issues raised by the public included: perimeter landscaping and visual screening of the facility, dust control, water usage, effectiveness of zoning enforcement in addressing violations the project may have if approved, proximity to a dairy farm located to the east of the Project Site, questions about the Transition Habitat Conservancy (a non-profit organization that the applicant will make a donation to for burrowing owl protection), and better notification of the Town Council for the area (Roosevelt).
17. *To be inserted after the public hearing to reflect hearing proceedings.*
18. The Commission finds that the proposed use is consistent with the underlying land use category of the adopted general plan for the area. The Project site is located in the N1 land use category of the Community Plan. This land use designation is intended for low-density and low-intensity uses such as low-density residential land uses. (The N1 designation permits 0.5 dwelling units per acre.)

The proposed use is not a residential project; however, the Community Plan allows for utility uses and non-residential uses in rural areas provided certain conditions are met. These include a public hearing process which shall impose appropriate conditioning for the project to ensure that negative impacts on adjacent land uses are minimized. This project has gone through the public hearing process and conditions have been adopted to ensure that impacts are minimized. Furthermore, an environmental review has been performed and mitigation measures have been identified that further reduce the environmental impacts of the project.

The Community Plan provides further guidelines for the development of non-residential uses in non-urban areas. These guidelines specify that the location, access, and design of the proposed use are compatible with the community’s rural character and will not have negative impacts to surrounding uses. The location,

access, and design of the proposed project are all compatible with the surrounding area, making the project appropriate for the area.

The photovoltaic solar energy facility is a largely passive utility-type use that is unobtrusive in its operation and maintenance and is therefore consistent with the permitted uses of the underlying land use categories.

The following policies of the General Plan are applicable to the proposed project:

- *General Goals and Policies Chapter – Land Use and Urban Development Pattern – Policy 23 (Page I-21): “Ensure that development in non-urban areas is compatible with rural lifestyles, does not necessitate the expansion of urban service systems, and does not cause significant negative environmental impacts or subject people and property to serious hazards.*

The proposed photovoltaic solar facility will be designed in a manner that is compatible with the rural lifestyle in the area. It is located on former farmland adjacent to existing SCE electrical power lines. It will be a largely passive utility-type use and will require little maintenance. It will be screened from public view with perimeter landscaping and/or fence screening. The project will not cause significant negative environmental impacts, nor will it subject people or property to serious hazard because measures have been adopted in the conditions to ensure that risks from fugitive dust will be reduced.

- *General Goals and Policies Chapter - Area Development Priorities – Policy 61 (Page I-31): “Maintain the open and rural character of the non-urban areas of the Antelope Valley.”*

The project site is an area that is considered rural. It is surrounded by vacant land, scattered residences, and farmland. The proposed project would essentially preserve the rural character of the community by developing a low-intensity land use on the property. The majority of the acreage of the fenced area of the solar array would be undisturbed as only approximately 10 percent of the site would be graded, and the development that is proposed is modest in its scale and use. The applicant will be required to provide an in-lieu fee to a non-profit organization that assists in the preservation of burrowing owl and Swainson’s hawk habitat.

- *Conservation and Open Space Chapter – Needs and Policies – Policy 2 (Page II-26): “Support the conservation of energy and encourage the development and utilization of new energy sources including geothermal, thermal waste, solar, wind and ocean-related sources.”*

The project is for a photovoltaic solar energy facility that will generate 7.45 megawatts of renewable energy.

- *Conservation and Open Space Chapter – Needs and Policies – Policy 3 (Page II-26): “Promote the use of solar energy to the maximum extent possible.”*

The project is for a photovoltaic solar energy facility that will generate 7.45 megawatts of renewable energy.

The following policies of the Community Plan are applicable to the proposed project:

- *Policy 19 (Page V-3): "Minimize disruption and degradation of the environment as land use development occurs, integrating land uses so that they are compatible with natural environmental systems."*

The project minimizes grading to the site. Grading will only occur for access roads, retention basins, equipment pads, and water tanks.

- *Policy 40 (Page V-6): "Encourage efficient utilization of resources in allocation of land to various uses, and incorporate energy conservation measures into the design and implementation of public and private projects."*

The project will generate 7.45 megawatts of carbon-free energy, reducing greenhouse gas emissions and allowing the State to meet its goals to reduce global climate change. The project will also minimize ground disturbance and puts modest demands on public infrastructure.

19. The Commission finds that the Project is consistent with the zoning for the area. The Project is considered an electric generating plant, which is a conditionally permitted use in the A-2 Zone. The Project, furthermore, meets all zoning regulations regarding setbacks and the applicant is requesting a modification to the fencing height requirements to permit a 7- to 8-foot fence around the perimeter of the Project Site. This modification is appropriate as it will allow the fence to be the same height all around the Project Site.

20. The Commission finds that the Project is compatible with the Community Plan, a component of the County General Plan. Its land use designation is N1 (Non-Urban 1). The N1 designation is intended for low-density residential uses of a maximum of 0.5 dwelling units per acre. The proposed use is not a residential project; however, the Community Plan allows for utility uses and non-residential uses in rural areas provided certain conditions are met. These include a public hearing process, which shall require appropriate conditioning of the project to ensure that negative impacts on adjacent land uses are minimized. This Project has gone through the public hearing process and conditions have been adopted to ensure that impacts are minimized. Furthermore, an environmental review has been performed and mitigation measures have been identified that further reduce the environmental impacts of the project.

The Community Plan provides further guidelines for the development of non-residential uses in non-urban areas. These guidelines specify that the location, access, and design of the proposed use are compatible with the community's rural character and will not have negative impacts to surrounding uses. As the Project will be a low-intensity, largely passive utility use appropriately located on disturbed land, will have adequate access to well-maintained and sufficiently wide streets, will be attractively landscaped and/or screened at its perimeter, and will be appropriately fenced, it is appropriate for the subject location.

Therefore, the Commission finds that the proposed use with the attached conditions will be consistent with the adopted general plan for the area.

21. The requested use is a largely passive utility use. It will not interfere with others' quiet enjoyment of their property. The photovoltaic facility will contain rows of solar panels with a maximum height of 6 to 8 feet. One or two water tanks for a total of 10,000 gallons of water, painted in earth tone colors and with a maximum height of approximately 18 feet, will also be located on the project site. During construction, and possibly also during operation, the project will be screened from view by fabric screening on the perimeter fence. The fence will be 6 feet tall and topped with 1 to 2 feet of barbed wire. Furthermore, potential perimeter landscaping along the northern and southern 500-foot portions of 87 Street East and along 90th Street East will soften the aesthetic impact of the facility. A Dust Control Plan will ensure that fugitive dust from the construction and operation of the project will be minimized.

Therefore, the Commission finds that the requested use at the location proposed will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

22. The Project site is comprised of two separate parcels and totals 80 gross acres. The site is large enough to accommodate all County requirements for fire safety, clearances, flood easements, and perimeter landscaping. As the site will be remotely monitored, there will be periodic visits for maintenance purposes. There is adequate space in the solar field for maintenance vehicles to park.

Therefore, the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.

23. The Project Site is located at the southwest corner of East Avenue F and 90th Street East. East Avenue F is 90 feet wide, and 90th Street East is 80 feet wide. Both highways are paved and are adequately improved to carry the traffic generated by both the construction and operation of the proposed facility. The County Bicycle Master Plan does not identify either 90th Street East or East Avenue F for bikeways, but the Project is not expected to generate bicycle trips. As the project will generate electricity for public consumption, a connection to SCE electrical lines will be made near the eastern boundary of the Project Site.

Therefore, the Commission finds that the proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of pedestrian, bicycle, and vehicle traffic such use would generate, and by other public or private service facilities as are required.

24. The Commission finds that to ensure continued compatibility between the Project and the surrounding land uses, it is necessary to limit the CUP to 35 years.

25. The Commission finds that pursuant to sections 22.60.174 and 22.60.175 of the County Code, the community was properly notified of the public hearing by mail, newspaper, and property posting. Additionally, the Project was noticed and case materials were available on Regional Planning's website and at libraries located in the vicinity of Roosevelt community. On November 25, 2014, a total of 33 Notices of Public Hearing were mailed to all property owners as identified on the County Assessor's record within a 1,000-foot radius from the Project Site, as well as 14 notices to those on the courtesy mailing list for the Antelope Valley East Zoned District and to any additional interested parties.
26. The Commission finds that the permittee is subject to payment of the California Department of Fish and Wildlife fees related to the Project's effect on wildlife resources pursuant to section 711.4 of the California Fish and Game Code.
27. The Commission finds that the MMRP, prepared in conjunction with the MND, identifies in detail how compliance with its measures will mitigate or avoid potential adverse impacts to the environment from the Project. The Board further finds that the MMRP's requirements are incorporated into the conditions of approval for this Project, and that approval of this Project is conditioned on the permittee's compliance with the attached conditions of approval and MMRP.
28. After consideration of the MND and MMRP, together with the comments received during the public review process, the Commission finds on the basis of the whole record before it that there is no substantial evidence that the Project as conditioned will have a significant effect on the environment, and further finds that the MND reflects the independent judgment and analysis of the Commission.
29. The Commission finds that the Final MND for the Project was prepared in accordance with CEQA, the State CEQA Guidelines, and the County's Environmental Document Reporting Procedures and Guidelines. The Commission reviewed and considered the Final MND, along with its associated MMRP, and finds that they reflect the independent judgment of the Commission.
30. The Commission finds that the MMRP for the Project is consistent with the conclusions and recommendations of the Final MND and that the MMRP's requirements are incorporated into the conditions of approval for the Project.
31. The Commission finds that the MMRP, prepared in conjunction with the Final MND, identifies in detail how compliance with its measures will mitigate or avoid potential adverse impacts to the environment from the Project.
32. The location of the documents and other materials constituting the record of proceedings upon which the Commission decision is based in this matter is at the Los Angeles County Department of Regional Planning, 13th Floor, Hall of Records, 320 West Temple Street, Los Angeles, California 90012. The custodian of such documents and materials shall be the Section Head of the Zoning Permits North Section, Department of Regional Planning.

BASED ON THE FOREGOING, THE REGIONAL PLANNING COMMISSION CONCLUDES THAT:

- A. The proposed use with the attached conditions will be consistent with the adopted General Plan.
- B. The proposed use at the site will not adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, will not be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, and will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
- C. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
- D. The proposed site is adequately served by highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate, and by other public or private service facilities as are required.

THEREFORE, THE REGIONAL PLANNING COMMISSION:

- 1. Certifies that the MND for the Project was completed in compliance with CEQA and the State and County CEQA Guidelines related thereto; certifies that it independently reviewed and considered the MND and that the MND reflects the independent judgment and analysis of Commission as to the environmental consequences of the Project; certifies that it considered the MMRP, finding that it is adequately designed to ensure compliance with the mitigation measures during Project implementation; determined that on the basis of the whole record before the Commission that there is no substantial evidence that the Project will have a significant effect on the environment; adopts the MND and finds that the MMRP is adequately designed to ensure compliance with the mitigation measures during Project implementation; and
- 2. Approves Conditional Use Permit No. 201300170, subject to the attached conditions.

ACTION DATE: January 7, 2015

PMC: AMC

December 30, 2014

c: Zoning Enforcement, Building and Safety

**DRAFT CONDITIONS OF APPROVAL
COUNTY OF LOS ANGELES
PROJECT NO. R2013-03397-(5)
CONDITIONAL USE PERMIT NO. 201300170**

PROJECT DESCRIPTION

The applicant, Antelope Valley Solar, LLC, requests a conditional use permit to authorize the construction, operation, and maintenance of a maximum 7.45-megawatt photovoltaic solar energy facility ("Project") on a net 72-acre property located on the southwest corner of Avenue F and 90th Street East in the unincorporated community of Roosevelt in the east Antelope Valley. The Project would be developed in two phases: Phase 1 would be located on the northern part of the property and would produce 4.45 megawatts, and Phase 2, if constructed, would be located on the southern part of the property and would produce the remaining 3 megawatts. The applicant currently only has a Power Purchase Agreement for Phase 1.

Solar panel technology would be either fixed-tilt (approximately 6 feet tall) or single-axis tracking systems (approximately 8 feet tall). Other Project components include: (1) an electrical collection and inverter transformer system, (2) a meteorological data collection system, (3) on-site roads, driveways, and retention basins, and (4) one or two water tank(s) for use by the Fire Department.

Perimeter landscaping and/or fence screening is proposed along 90th Street East, and along the northern and southern 500-foot portions of 87th Street East. The entire facility will be surrounded by a 6-foot chain-link fence topped with 1 to 2 feet of barbed wire. An interconnection to the electrical grid will be made to Southern California Edison's (SCE) electrical power lines near the Project's eastern boundary. Construction for the Project will entail 28,400 cubic yards of grading (total for Phases 1 and 2).

GENERAL CONDITIONS

1. Unless otherwise apparent from the context, the term "permittee" shall include the applicant, owner of the property, tenants and licensees of the property, and any other person, corporation, or other entity making use of this grant.

Except as otherwise specified, the Conditions of Approval will be accomplished for Phase 1 of the Project in connection with the development and construction of Phase 1 of the Project, and separately for Phase 2 of the Project in connection with the development and construction of Phase 2 of the Project. No Phase of the Project will be responsible for satisfying the Conditions of Approval for any other Phase of the Project. Conditional Use Permit No. 201300170 ("CUP") issued in respect of the Project will not be terminated or revoked, and the rights under the CUP shall not be diminished, with respect to any Phase of the Project as a result of a breach or default of the CUP, or the conditions of approval thereof, by any other Phase of the Project, except when both phases of the Project are in breach or default of the CUP or the Conditions of Approval thereof.

2. This grant shall not be effective for any purpose until the permittee, and the owner of the subject property if other than the permittee, have filed at the office of the Los Angeles County ("County") Department of Regional Planning ("Regional Planning") their affidavit stating that they are aware of and agree to accept all of the conditions of this grant, and that the conditions of the grant have been recorded as required by Condition No. 7, and until all required monies have been paid pursuant to Conditions No. 10, 11, and 14. Notwithstanding the foregoing, this Condition No. 2 and Condition Nos. 4, 5, 9, and 12 shall be effective immediately upon the date of final approval of this grant by the County.
3. Unless otherwise apparent from the context, the term "date of final approval" shall mean the date the County's action becomes effective pursuant to Section 22.60.260 of the County Code.
4. The permittee shall defend, indemnify, and hold harmless the County, its agents, officers, and employees from any claim, action, or proceeding against the County or its agents, officers, or employees to attack, set aside, void, or annul this permit approval, which action is brought within the applicable time period of Government Code Section 65009 or any other applicable limitations period. The County shall promptly notify the permittee of any claim, action, or proceeding and the County shall reasonably cooperate in the defense. If the County fails to promptly notify the permittee of any claim, action, or proceeding, or if the County fails to cooperate reasonably in the defense, the permittee shall not thereafter be responsible to defend, indemnify, or hold harmless the County.
5. In the event that any claim, action, or proceeding as described above is filed against the County, the permittee shall within ten days of the filing make an initial deposit with Regional Planning in the amount of up to \$5,000.00, from which actual costs and expenses shall be billed and deducted for the purpose of defraying the costs or expenses involved in Regional Planning's cooperation in the defense, including but not limited to, depositions, testimony, and other assistance provided to permittee or permittee's counsel.

If during the litigation process, actual costs or expenses incurred reach 80 percent of the amount on deposit, the permittee shall deposit additional funds sufficient to bring the balance up to the amount of \$5,000.00. There is no limit to the number of supplemental deposits that may be required prior to completion of the litigation.

At the sole discretion of the permittee, the amount of an initial or any supplemental deposit may exceed the minimum amounts defined herein. Additionally, the cost for collection and duplication of records and other related documents shall be paid by the permittee according to County Code Section 2.170.010.

6. If any material provision of this grant is held or declared to be invalid by a court of competent jurisdiction, the permit shall be void and the privileges granted hereunder shall lapse.

7. Prior to the use of this grant, the permittee, or the owner of the subject property if other than the permittee, shall **record the terms and conditions** of the grant in the office of the County Registrar-Recorder/County Clerk ("Recorder"). In addition, upon any transfer or lease of the property during the term of this grant, the permittee, or the owner of the subject property if other than the permittee, shall promptly provide a copy of the grant and its conditions to the transferee or lessee of the subject property.
8. **This grant shall terminate on January 7, 2050.** Entitlement to use of the property thereafter shall be subject to the regulations then in effect. If the permittee intends to continue operations after such date, whether or not the permittee proposes any modifications to the use at that time, the permittee shall file a new conditional use permit application with Regional Planning, or shall otherwise comply with the applicable requirements at that time. Such application shall be filed at least six (6) months prior to the expiration date of this grant and shall be accompanied by the required fee. In the event that the permittee seeks to discontinue or otherwise change the use, notice is hereby given that the use of such property may require additional or different permits and would be subject to the then-applicable regulations.
9. This grant shall expire unless used within two (2) years from the date of final approval of the grant. A single one-year time extension may be requested in writing and with the payment of the applicable fee prior to such expiration date. Construction of one phase shall be considered use of this grant.
10. The subject property shall be maintained and operated in full compliance with the conditions of this grant and any law, statute, ordinance, or other regulation applicable to any development or activity on the subject property. Failure of the permittee to cease any development or activity not in full compliance shall be a violation of these conditions. Inspections shall be made to ensure compliance with the conditions of this grant as well as to ensure that any development undertaken on the subject property is in accordance with the approved site plan on file. The permittee shall deposit with the County the sum of **\$5,000.00**. The deposit shall be placed in a performance fund draw-down account, which shall be used exclusively to compensate Regional Planning for all expenses incurred while inspecting the premises to determine the permittee's compliance with the conditions of approval. The permittee shall replenish the fund to provide for additional inspections to cover the life of the grant. If the actual costs incurred have reached 80 percent of the initial deposit (\$4,000.00), and the permittee has been notified, the permittee shall deposit supplemental funds to bring the balance up to the initial deposit (\$5,000.00) within 10 business days of such notification. Inspections may be unannounced.

If additional inspections are required to ensure compliance with the conditions of this grant, or if any inspection discloses that the subject property is being used in violation of any one of the conditions of this grant, the permittee shall be financially responsible and shall reimburse Regional Planning for all additional enforcement efforts necessary to bring the subject property into compliance. The amount

charged for additional inspections shall be \$200.00 per inspection, or the current recovery cost at the time any additional inspections are required, whichever is greater.

11. Within five (5) working days from the day after your appeal period ends on January 14, 2015, the permittee shall remit processing fees payable to the County of Los Angeles in connection with the filing and posting of a Notice of Determination (NOD) for this project and its entitlements in compliance with Section 21152 of the Public Resources Code. Unless a Certificate of Exemption is issued by the California Department of Fish and Wildlife pursuant to Section 711.4 of the California Fish and Game Code, the permittee shall pay the fees in effect at the time of the filing of the NOD, as provided for in Section 711.4 of the Fish and Game Code, currently **\$2,285.00** (\$2,210.00 for a Negative Declaration or Mitigated Negative Declaration plus \$75.00 processing fee), or **\$3,144.75** (\$3,069.75 for an Environmental Impact Report plus \$75.00 processing fee.) No land use project subject to this requirement is final, vested or operative until the fee is paid.
12. The permittee shall comply with all mitigation measures identified in the Mitigation Monitoring Program ("MMP"), which are incorporated by this reference as if set forth fully herein.
13. Within thirty (30) days of the date of final approval of the grant by the County, the permittee shall record a covenant and agreement, which attaches the Mitigation Monitoring Program ("MMP") and agrees to comply with the mitigation measures imposed by the Mitigated Negative Declaration for this project, in the office of the Recorder. Prior to recordation of the covenant, the permittee shall submit a draft copy of the covenant and agreement to Regional Planning for review and approval. As a means of ensuring the effectiveness of the mitigation measures, the permittee shall submit annual mitigation monitoring reports to Regional Planning for approval or as required. The reports shall describe the status of the permittee's compliance with the required mitigation measures.
14. The permittee shall deposit an initial sum of \$6,000.00 with Regional Planning within thirty (30) days of the date of final approval of this grant in order to defray the cost of reviewing and verifying the information contained in the reports required by the MMP. The permittee shall replenish the mitigation monitoring account if necessary until all mitigation measures have been implemented and completed.
15. Notice is hereby given that any person violating a provision of this grant is guilty of a misdemeanor. Notice is further given that the Regional Planning Commission ("Commission") or a Hearing Officer may, after conducting a public hearing, revoke or modify this grant, if the Commission or Hearing Officer finds that these conditions have been violated or that this grant has been exercised so as to be detrimental to the public's health or safety or so as to be a nuisance, or as otherwise authorized pursuant to Chapter 22.56, Part 13 of the County Code.

16. All development pursuant to this grant must be kept in full compliance with the County Fire Code to the satisfaction of said department.
17. All development pursuant to this grant shall conform with the requirements of the County Department of Public Works ("Public Works") to the satisfaction of said department.
18. All development pursuant to this grant shall comply with the requirements of Title 22 of the County Code and of the specific zoning of the subject property, unless specifically modified by this grant, as set forth in these conditions, including the approved Exhibit "A," or a revised Exhibit "A" approved by the Director of Regional Planning ("Director").
19. The permittee shall maintain the subject property in a neat and orderly fashion. The permittee shall maintain free of litter all areas of the premises over which the permittee has control.
20. All structures, walls and fences open to public view shall remain free of graffiti or other extraneous markings, drawings, or signage that was not approved by Regional Planning. These shall include any of the above that do not directly relate to the business being operated on the premises or that do not provide pertinent information about said premises. The only exceptions shall be seasonal decorations or signage provided under the auspices of a civic or non-profit organization.

In the event of graffiti or other extraneous markings occurring, the permittee shall remove or cover said markings, drawings, or signage within 24 hours of notification of such occurrence, weather permitting. Paint utilized in covering such markings shall be of a color that matches, as closely as possible, the color of the adjacent surfaces.

21. The subject property shall be developed and maintained in substantial conformance with the plans marked Exhibit "A." If changes to any of the plans marked Exhibit "A" are required as a result of instruction given at the public hearing, **three (3) copies** of a modified Exhibit "A" shall be submitted to Regional Planning by **March 7, 2015**.
22. In the event that subsequent revisions to the approved Exhibit "A" are submitted, the permittee shall submit **three (3) copies** of the proposed plans to the Director for review and approval. All revised plans must substantially conform to the originally approved Exhibit "A". All revised plans must be accompanied by the written authorization of the property owner(s) and applicable fee for such revision.

PERMIT SPECIFIC CONDITIONS - CONDITIONAL USE PERMIT (SOLAR FACILITY)

23. The permittee shall submit to Regional Planning a Perimeter Fence Screening/Landscape Plan for review and approval and shall comply with all

requirements of such plan. Prior to submitting such plan to Regional Planning, the permittee shall submit the plan to the Roosevelt Town Council for their review.

24. The permittee shall irrigate the perimeter landscaping (if, and/or where, perimeter landscaping is determined to be necessary by Regional Planning as part of the Perimeter Fence Screening/Landscape Plan referenced in Condition No. 23) for a minimum of three years or until the landscaping has successfully established. The permittee shall ensure that the perimeter landscaping remains successfully established to the satisfaction of Regional Planning throughout the entire grant term. The permittee shall maintain all landscaping in a neat, clean, and healthful condition and shall properly prune, weed, remove litter, fertilize and replace plants when necessary. Perimeter fencescreening fabric/material shall be maintained in good condition and missing, tattered, or torn pieces shall be repaired or replaced as necessary.
25. Prior to any ground disturbance and/or the issuance of grading permits, the permittee shall submit a dust control plan, including a dust plume response plan, for review and approval by Regional Planning and the Antelope Valley Air Quality Management District (AVAQMD). The permittee shall abide by all requirements and conditions of the approved dust control plan.
26. Prior to obtaining any building permit, the permittee shall provide the County with a decommissioning plan ("Decommissioning Plan") in connection with any and/or all of the terminating events described in Condition No. 29, which Plan shall include, at a minimum, a detailed plan for decommissioning and deconstructing the facility and for restoration of the site (collectively referred to as "decommissioning"). The Decommissioning Plan shall be developed to the satisfaction of the Director and the Director of Public Works and subject to their review and approval.

The Decommissioning Plan shall provide for, including, but not limited to, the following:

- a. Removal of solar panel structures and all appurtenant above-ground equipment;
- b. Removal of on-site overhead poles and above-ground electricity lines;
- c. Removal of all on-site water and sewage lines and septic tanks;
- d. Removal of permanent above-ground transmission lines and poles located in the public right-of-way if determined not usable by Public Works and/or any other applicable public or private utility;
- e. Restoration of any disturbed soil and revegetation of the site to its pre-construction condition, with native vegetation similar to the vegetation in the surrounding vicinity;
- f. Restoration or reclamation of project roads to their pre-construction condition unless the then-existing owner of the site elects to retain the improved roads for access throughout the site;
- g. Documentation of the pre-construction condition of the project site, including, but not limited to, a photographic record; and

- h. Details of the performance and financial assurance guarantees described in Condition No. 27, explaining the amounts and schedule for the provision of such guarantees.
- 27. Prior to obtaining any building permits, the permittee shall provide to the County, to the satisfaction of the Director and the Director of Public Works, performance and financial assurance guarantees in an amount sufficient to ensure the performance of the approved Decommissioning Plan, as described in Condition No. 26. Additionally, the permittee shall be solely responsible for the costs and expenses associated with decommissioning the site after any of the terminating events described in Condition No. 29. In the event that the performance and financial assurance guarantees are not sufficient to fully compensate the County for the cost and expense of decommissioning the site, the permittee shall be responsible for compensating the County for any shortfall. In determining the sufficiency of the performance and financial assurance guarantees, the residual value of the solar panels, support structures, and other salvageable equipment (collectively "Salvageable Property") shall be considered. The residual value of the real property itself shall not be considered or included in the determination of whether the performance and financial guarantees are sufficient.

With respect to the performance and financial assurance guarantees, the following requirements shall apply:

- a. The permittee shall ensure that such guarantees are detailed in the approved Decommissioning Plan to the satisfaction of the Director and the Director of Public Works, and that such Decommissioning Plan shall explain the amounts and schedule for the provision of such guarantees.
- b. The permittee shall provide a report to the Director every five years after the date of final approval of this grant to confirm that the performance and financial assurance guarantees are sufficient to ensure performance and implementation of the Decommissioning Plan. The report shall be subject to review and approval by the Director and Director of Public Works particularly as to whether the performance and financial assurance guarantees are adequate to meet existing conditions at the time of the report.

A decommissioning pro forma summarizing the residual value of the Salvageable Property shall be included in the report. The pro forma shall include, at a minimum, the expected revenue from all Salvageable Property, as defined in this Condition No. 27, the then-current cost of decommissioning the site, as required by the approved Decommissioning Plan, and the then-current value of any performance and financial assurance guarantees that have been provide as of the date of such report. In the event it is determined that the performance and financial assurance guarantees as insufficient to perform the decommissioning of the site as required by the approved Decommissioning Plan, the permittee shall be required to provide additional performance and financial assurance

guarantees to the satisfaction of the Director and the Director of Public Works;

- c. Any funds not used by the County in connection with decommissioning the site shall be returned to the permittee; and
- d. The performance and financial assurance guarantees may consist of, including, but not limited to, one or more of the following, to the satisfaction of the Director and Director of Public Works:
 - (1) An irrevocable letter of credit;
 - (2) A surety bond;
 - (3) An appropriate insurance policy;
 - (4) A trust fund or escrow account established and maintained in accordance with approved financial assurances and practices to guarantee that decommissioning the site will be completed in accordance with the approved Decommissioning Plan as approved by the Department of Public Works; or
 - (5) Other financial assurances as reviewed and approved by the respective County administrative offices, in consultation with Regional Planning.

A corporate guarantee shall not be considered a sufficient financial assurance guarantee.

- 28. Upon discontinuance of the permittee's operation as set forth in Condition No. 29, abandonment of the project in whole or in part, or termination of this grant as described in Condition No. 8, and in the event that a new permit application is not timely filed for a continued similar use or reuse of the site, the permittee shall perform decommissioning in accordance with the approved Decommissioning Plan, or compensate the County for use of a County-contracted consultant to perform such decommissioning. In the alternative, and at the County's sole election, the County shall be entitled to use any performance and/or financial assurance guarantees, as described in Condition No. 27 (d), to perform the decommissioning itself or to contract for such decommissioning. The permittee shall grant the County the necessary access to the subject property to perform such decommissioning or to allow a County-retained contractor to perform such decommissioning.
- 29. In the event that any portion of the solar field is not in operational condition for a consecutive period of 24 months, operations for the portion of the site shall be deemed to have been discontinued and that portion of the facility shall be removed from the site within 60 days from the date that written notice is sent to the permittee from Regional Planning. Within this 60-day period, the permittee may provide the Director a written request and justification for an extension of up to 12 months to resume operations of that portion of the site, which request shall be subject to the satisfaction and approval of the Director. A second written request and justification for a second extension of up to 12 months may also be submitted, which the Director may grant if the request is adequately justified based on the

Director's determination. In no event shall the operations of the solar field or portion of the solar field be discontinued for more than 36 months from the date such operations were first deemed discontinued without being decommissioned pursuant to the approved Decommissioning Plan. Further, in no event shall any extension of the period to resume operations of any portion of the site pursuant to this Condition No. 29 be deemed to extend the term or expiration date of this grant.

PROJECT SITE SPECIFIC CONDITIONS

30. This grant shall authorize the construction, operation, and maintenance of a photovoltaic solar energy facility, generation tie-line, and appurtenant equipment in two phases on a net 72-acre site and for modification to fence heights to allow a 7- to 8-foot fence around the perimeter of the Project Site.
31. Nothing in this grant shall prevent the permittee from installing more efficient solar panels in the future, increasing output, provided the footprint and overall disturbance area of the project does not increase. At such time the permittee wishes to install more efficient solar panels, a Revised Exhibit "A" shall be submitted to the County for such installation.
32. Appropriate training for respiratory protection shall be provided to construction workers. Dust masks (National Institute for Occupational Safety and Health [NIOSH] approved) shall be provided with proper training to construction workers to mitigate against dust exposure and possibly Valley Fever during high-wind events and/or dust-generating activities. Evidence of this training shall be kept on site and shall be made available to County staff upon request.
33. The project shall comply with all requirements of the Rural Outdoor Lighting District.
34. The water tanks on the subject property shall be painted an earth-tone color (beige, sand, taupe or similar colors) to blend in with the surroundings, subject to review and approval by the Director.
35. The Project shall be limited to the use of trucked recycled water and/or water from sources not subject to the adjudication process currently in effect for the Antelope Valley groundwater basin for construction and operation of the Project.
36. Mobile sanitation facilities and a potable drinking water supply shall be made available to workers during construction of the Project subject to the satisfaction of the Department of Public Health.
37. The permittee shall provide parking as required by the County Code, calculated at a parking ratio of one parking space for each two persons employed. The unmanned solar photovoltaic facility does not include operations buildings or other buildings but does require occasional servicing, which requires one space per two persons servicing the facility. These spaces do not have to be marked. During

construction parking shall be provided on-site and/or off-site at a location approved by the Director.

38. The permittee shall abide by the following dust control measures:

- a. During site preparation and during operations, vegetation shall be retained or mowed in and around array sites to prevent vegetative root loss. Disking, tilling, or grading of array sites is prohibited except where specifically authorized by Public Works. Roads, drainage basins, equipment pads, and any other required earthwork authorized by Public Works shall be done in compliance with grading regulations;
 - b. Maintain dust control using (to the extent applicable) phased earthwork, watering, clean gravel, composted wood chips not to exceed 6 inches in depth, application of non-toxic soil stabilizers, revegetation, limited public access on unpaved areas, speed limits on construction sites, and other dust control measures used during construction, operations, and removal and restoration activities;
 - c. Permittee shall provide on the Project site weather stations, monitors with wind speed, wind direction, temperature and humidity sensors, and mechanical dust-monitoring devices, placed to the satisfaction to AVAQMD, to ensure the effectiveness of the Project's dust control treatment on the Project site;
 - d. Establish vegetation along certain portions of the Project perimeter, if required by the Perimeter Fence Screening/Landscape Plan, as early as feasible following Project approval for both visual screening and to limit off-site movement of dust.
 - e. During construction, the permittee shall pay the costs of an on-site mitigation and conditions compliance monitor, satisfactory to the Director, to independently monitor and report on Project compliance. The monitor shall be on-site during all site preparation, grading, and excavation and backfilling work.
39. Temporary screening of construction and staging areas (e.g. fencing with fabric or slats) shall be installed prior to construction activities to the satisfaction of Regional Planning. This screening may remain permanently if determined appropriate by Regional Planning as part of the Perimeter Fence Screening/Landscape Plan referenced in Condition No. 23.
40. The Regional Planning project number, conditional use permit number and lease holder contact information shall be prominently displayed on the facility accessible to the public where it can be easily viewed at or near eye level.
41. The permittee shall comply with all conditions set forth in the attached County Public Works, Fire, Public Health Department letters dated December 30, 2014, January 8, 2014, and January 30, 2014.

Attachments:

Mitigation Monitoring Program (pages 1- 18)
Fire/Public Works/Public Health Department Letters

MITIGATION MONITORING AND REPORTING PROGRAM

CEQA requires a Mitigation Monitoring and Reporting Program (MMRP) for projects where mitigation measures are a condition of project approval and development. The Initial Study / Mitigated Negative Declaration prepared for the Antelope Valley Solar Renewable Energy Project, Project No. R2013-03397-(5), CUP No. 201300170, identified mitigation measures, where appropriate, to avoid or substantially reduce the environmental impacts associated with the Project. This MMRP is designed to monitor the implementation of those mitigation measures. Accordingly, this MMRP has been prepared in compliance with the requirements of CEQA Section 21081.6 and CEQA Guidelines Section 15097. This section lists each of the required Mitigation Measures (MMs) and identifies the corresponding action required for proof of compliance, the mitigation timing the party responsible for implementation, and the monitoring agency or party responsible for ensuring each measure is adequately implemented.

PROJECT: PHASE 1						
NO.	PDF/MM	Mitigation	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
General						
1		Except as otherwise specified, the Mitigation Measures set forth herein will be accomplished for Phase 1 of the Project in connection with the development and construction of Phase 1 of the Project, and separately for Phase 2 of the Project in connection with the construction of Phase 2 of the Project. No Phase of the Project will be responsible for satisfying the Mitigation Measures of any other Phase of the Project. Conditional Use Permit #201300170 ("CUP") issued in respect of the Project will not be terminated or revoked, and the rights under the CUP shall not be diminished, with respect to any Phase of the Project as a result of a breach or default of the CUP, or Mitigation Measures or other conditions or conditions of approval thereof, by any other Phase of the Project, except when both phases of the Project are	N/A	N/A	N/A	N/A

Antelope Valley Solar Renewable Energy Project
County of Los Angeles
Project No. R2013-03397-(5), CUP No. 201300170

		in breach or default of the CUP or the conditions of approval.				
Aesthetics						
2	AES-1	The Project shall incorporate either (a) drought-tolerant (native or non-native) vegetative landscaping periodically spaced, and/or (b) fence screening that is suitable to withstand the typical weather and climate conditions near the Site (which, for clarity, will not include slats), in either case installed along the portions of the perimeter fence parallel to 90th Street East and parallel to the northern and southern 500-foot portions of 87th Street East. The landscaping or screening parallel to the perimeter fencing for Phase 1 of the Project will be accomplished with Phase 1 of the Project, and the landscaping or screening parallel to the perimeter fencing for Phase 2 of the Project will be accomplished with Phase 2 of the Project. A Perimeter Fence Screening/Landscape Plan shall be prepared by Applicant and reviewed and approved by the County. In connection with any landscaping installed, irrigation via water trucks will be conducted until the landscaping is established.	A. Submittal and approval of a Perimeter Fence Screening/Landscape Plan. Installation of landscaping/screening as described in the Perimeter Fence Screening/Landscape Plan.	Prior to issuance of certificate of occupancy	Applicant	DRP
			B. Maintenance of landscaping during operation.	During operation	Operator	DRP
3	AES-2	Any lighting that may be installed in specific locations around the periphery of the Site, as required for nighttime security purposes, shall consist of modern, low intensity, downward-shielded fixtures that are motion-activated, and will be directed onto the Site. Motion-detectors shall be set at a sensitivity level that cannot be triggered by small animal movement.	C. Submit lighting plan for review and approval	Prior to issuance of building permit	Applicant	DRP
Air Quality						
4	AQ-1	During construction, the Project shall comply with Antelope Valley Air Quality Management	A. Submittal and approval of a Dust	Prior to issuance of grading permit	Applicant	DRP / AVAQMD

	<p>District's (AVAQMD's) Rule 403, Fugitive Dust, by preparing a Dust Control Plan for controlling fugitive dust. The Dust Control Plan shall be subject to the review and approval of AVAQMD and include the following strategies:</p> <p>a. <u>Minimal Grading and Ground Disturbance:</u> The Project would perform the minimum amount of grading and disturb the minimum amount of existing vegetation to construct the Project. Generally, graded areas shall be limited to fire access/service roads, substations, water tanks, inverter, equipment, and switchgear pads, and retention basins. Clearing and grubbing may occur throughout the Site. The existing vegetation under the proposed solar panels will not be removed but may be moved.</p> <p>b. <u>Construction Scheduling:</u> Grading activities would be temporarily halted and/or Site watering would be increased during wind speeds that exceed 25 miles per hour, or when visible dust plumes have the potential to be transported off of the Site.</p> <p>c. <u>Water Application:</u> During construction, the Project would apply water to control fugitive dust from the Site as necessary and required by the AVAQMD.</p> <p>d. <u>Soil Binders/Wood Mulch:</u> Soil binders or wood mulch would be applied if and as necessary.</p> <p>e. <u>Monitoring:</u> A qualified construction mitigation manager or delegate ("CMNF") would be onsite during all grading, excavation, storage, and backfill activities to ensure</p>			
Control Plan.	B. Implementation of dust control measures as described in the Dust Control Plan during construction.	During construction and during operations	Applicant	DRP/ AVAQMD

		compliance with the approved Dust Control Plan. The CMM would monitor all construction activities for visible dust plumes, and would promptly implement additional dust plume reduction measures in the event that such visible dust plumes are observed. Additional measures to be implemented, as necessary, would include increased watering, application of dust palliatives, and/or scaled back construction activities up to and including temporary work cessation.			
Biological Resources					
5	BIO-1	<p>Pre-construction surveys:</p> <p>a. A pre-construction burrowing owl survey should be conducted no more than 14 days prior to the initiation of ground disturbance activities and a final survey should also be conducted no earlier than 24 hours prior to ground disturbance. If no burrowing owls are detected during the pre-construction survey, ground disturbance activities can proceed without further consideration of this species. If burrowing owls are detected during the take avoidance survey, additional avoidance and minimization measures would then be required, under the guidance of the California Department of Fish & Wildlife ("CDFW"), provided that mitigation acreage acquired for Swainson's hawk (if required) that is similar to the relatively low quality of the site will also be sufficient to replace lost burrowing owl habitat.</p> <p>b. Conduct a 30-day desert kit fox and American badger pre-construction survey prior to ground disturbance to identify any burrows on the Site. If any burrows are identified and</p>	Field survey	Prior to construction	Applicant
					DRP / CDFW

		<p>determined to be inactive, a qualified biologist shall excavate such burrows by hand. If any burrows are actively being used as natal dens, a 250-foot buffer around such burrows shall be established until such burrows are no longer being used as natal dens. If any desert kit fox burrows are actively being used, but not as natal dens, the desert kit fox may be encouraged to depart the site, provided that no "take" may occur, and once such burrows are inactive, they can be excavated to prevent further occupancy.</p> <p>c. To comply with the Migratory Bird Treaty Act (MBTA), if any ground disturbance is anticipated during the nesting bird season (February-August) the project proponent will initiate a breeding/nesting bird survey to ensure no nesting birds are impacted. If a nesting bird is detected, the area will be avoided and a 50-meter buffer will be installed until the nesting birds have fledged and have been observed to be foraging independently.</p> <p>d. A CNDDDB form should be submitted for any burrowing owl and any other sensitive species encountered in order to provide the resource agency personnel and biological consultants with a better understanding of sensitive species distribution in this area.</p>				
6	BIO-2	Conduct a 30-day pre-construction survey of the Swainson's hawk nest location identified in CNDDDB #2416. If no nest is identified, or if a nest is identified but subsequently determined to be unsuccessful, construction activities can proceed without further consideration of this species. If a Swainson's hawk nest is identified and successfully established, all construction	Field survey	Prior to construction	Applicant	DRP / CDFW

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		activities shall be postponed until CDFW is consulted. If any mitigation land is required for Swainson's hawk, mitigation land for Phase 1 of the Project shall be obtained prior to ground disturbance for Phase 1 of the Project, and mitigation land for Phase 2 of the Project shall be obtained prior to ground disturbance for Phase 2 of the Project.				
7	BIO-3	Construction workers should be provided with an information pamphlet on burrowing owl biology and (although unlikely to occur on the site) general desert tortoise biology, how to recognize and avoid burrowing owl and desert tortoises, authorized speed limits while working within the site, trash abatement and checking under parked vehicles and equipment prior to moving. If a burrowing owl or desert tortoise is detected on site, all construction activity would be suspended and the resource agencies notified to determine appropriate measures.	Provide information	During construction	Construction Manager	DRP
8	BIO-4	Provide a trash abatement program with sealed trash containers on site to prevent unwanted tortoise predators such as ravens and coyotes.	Provide sealed trash containers	During construction and operations	Construction Manager	DRP
9	BIO-5	Vehicular speed limits of 15 miles per hour on all project related access roads and work areas.	Enforce speed limits	During construction and operations	Construction Manager	DRP
10	BIO-6	Utilize existing roads, whenever possible, to minimize disturbance to potential habitat.	Utilize existing roads	During construction and operations	Construction Manager	DRP
11	BIO-7	Applicant has agreed to pay an in-lieu fee to a non-profit organization in support of a project that assists in the preservation of burrowing owl and Swainson's hawk habitat (the "In-Lieu Project"). The amount of the in-lieu fee shall be acceptable to the County and determined based on an	Payment of in-lieu fee	Prior to ground disturbance	Applicant	DRP

		assessment of the benefit of the In-Lieu Project to the preservation of the burrowing owl and Swainson's hawk habitat and the loss of the potential burrowing owl and Swainson's hawk habitat on the Site, which is acknowledged to be low quality habitat for burrowing owl and Swainson's hawk. As an example, an In-Lieu Project that provides fencing around a conservation area that contains high-quality habitat for burrowing owl and Swainson's hawk may be the type of In-Lieu Project acceptable to the County. The in-lieu payment shall be made prior to ground disturbance for Phase 1 of the Project, and such payment shall satisfy this mitigation measure for both Phase 1 and Phase 2 of the Project.				
12	BIO-8	Following the completion of construction, Applicant will have a qualified biologist perform a survey twice per year to document avian mortality at the Project. Annually, the biologist will prepare a report documenting the findings from such surveys and will provide, or make available, such report to the County, CDFW, and United States Fish & Wildlife. If the biologist fails to find evidence of avian mortality for three (3) consecutive years, Applicant shall no longer be required to perform such surveys; provided, however, that in the event of a significant increase in aquatic insects at the Project (e.g., due to flooding), Applicant will perform additional surveys to identify avian mortality at the Project. During the winter months of the first year following the completion of Project construction, Applicant will survey the Project on a monthly basis, but such surveys may be conducted by Applicant's employees and contractors who have been properly trained to identify evidence of avian mortality. If evidence of avian mortality is found, a	Annually submit a report of avian mortality. If no mortalities are reported during a consecutive three year period further reports are no longer required.	One year after energization	Applicant	DRP, CDFW, United States Fish & Wildlife

Antelope Valley Solar Renewable Energy Project
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		qualified biologist will be contacted to assess such findings.			
13	BlO-9	During the construction of the Project, (a) all excavations, holes, and trenches greater than two feet deep (if any) will be adequately covered to prevent entrapment of desert kit fox, and will be inspected by a biological monitor prior to initiating the workday; (b) when applicable, the Project will utilize a biological monitor to inspect all construction pipes, culverts, or similar structures (if any) greater than 4-inches diameter for kit fox prior to the structure being capped, buried, or moved; any kit fox found to be present within the structure must be allowed to move on its own accord; (c) domesticated dogs will not be allowed on the Site; and (d) rodenticides will not be used on the Site.	Daily monitoring the construction site to assure implementation of the mitigation measure.	During construction	Construction Manager
					DRP
Cultural Resources					
14	CUL-1	In the unlikely event that historical, archaeological, or paleontological resources are identified on the Site during ground-disturbing activities, a qualified archaeologist or paleontologist (as appropriate) will assess the significance of any find and will have the authority to stop or divert the construction excavation as necessary. Work may proceed in other areas of the Site. A plan to mitigate any adverse impacts will be prepared and undertaken, and work may proceed on the Site once evaluation of the find is complete.	Evaluate any cultural resources discovered.	During construction	Applicant / Construction Manager
					DRP

15	CUL-2	In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found during ground-disturbing activities, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). Such descendants shall complete their inspection within 48 hours of being granted access to the Site.	If human remains are discovered, contact County Coroner	During construction	Applicant / Construction Manager	DRP / Coroner
Hazards and Hazardous Materials						
16	HAZ-1	Prior to commencement of onsite ground-disturbing activities, Applicant shall obtain soil samples from the Site and test such samples for the presence of agricultural chemicals (insecticides, pesticides, and/or herbicides). If chemical levels are above regulatory standards, remediation and/or removal of contaminated soils in compliance with applicable local, state, and federal standards and requirements shall be conducted prior to Project construction.	Preconstruction soil testing and compliance with applicable regulations.	Prior to construction.	Applicant / Construction Manager	LAFD
Utilities and Service Systems						
17	UTIL-1	Construction activities on the Site shall be conducted in compliance with Chapter 20.87 (Construction and Demolition Debris Recycling and Reuse) of the Los Angeles County Code. A Recycling and Reuse Plan (RRP) must be submitted to the Los Angeles County Department of Public Works, Environmental Programs Division prior to grading permits being issued for each of Phase 1 and Phase 2 of the Project.	Submittal and approval of a RRP.	Prior to issuance of building permit.	Construction Manager	DPW

PROJECT: PHASE 2

NO.	PDF/MM	Mitigation	Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
General						
18		Except as otherwise specified, the Mitigation Measures set forth herein will be accomplished for Phase 1 of the Project in connection with the development and construction of Phase 1 of the Project, and separately for Phase 2 of the Project in connection with the construction of Phase 2 of the Project. No Phase of the Project will be responsible for satisfying the Mitigation Measures of any other Phase of the Project. Conditional Use Permit #201300170 ("CUP") issued in respect of the Project will not be terminated or revoked, and the rights under the CUP shall not be diminished, with respect to any Phase of the Project as a result of a breach or default of the CUP, or Mitigation Measures or other conditions or conditions of approval thereof, by any other Phase of the Project, except when both phases of the Project are in breach or default of the CUP or the conditions of approval.	N/A	N/A	N/A	N/A
Aesthetics						
19	AES-1	The Project shall incorporate either (a) drought-tolerant (native or non-native) vegetative landscaping periodically spaced, and/or (b) fence screening that is suitable to withstand the typical weather and climate conditions near the Site	A. Submittal and approval of a Perimeter Fence Screening/Landscape Plan.	Prior to issuance of certificate of occupancy	Applicant	DRP

		(which, for clarity, will not include slats), in either case installed along the portions of the perimeter fence parallel to 90th Street East and parallel to the northern and southern 500-foot portions of 87th Street East. The landscaping or screening parallel to the perimeter fencing for Phase 1 of the Project will be accomplished with Phase 1 of the Project, and the landscaping or screening parallel to the perimeter fencing for Phase 2 of the Project will be accomplished with Phase 2 of the Project. A Perimeter Fence Screening/Landscape Plan shall be prepared by Applicant and reviewed and approved by the County. In connection with any landscaping installed, irrigation via water trucks will be conducted until the landscaping is established.	Installation of landscaping/screening as described in the Perimeter Fence Screening/Landscape Plan.	Prior to energization of the solar panels	Applicant	DRP
20	AES-2	Any lighting that may be installed in specific locations around the periphery of the Site, as required for nighttime security purposes, shall consist of modern, low intensity, downward-shielded fixtures that are motion-activated, and will be directed onto the Site. Motion-detectors shall be set at a sensitivity level that cannot be triggered by small animal movement.	B. Maintenance of landscaping during operation. C. Submit lighting plan for review and approval	During operation	Operator	DRP
Air Quality						
21	AQ-1	During construction, the Project shall comply with Anelope Valley Air Quality Management District's (AVAQMD's) Rule 403, Fugitive Dust, by preparing a Dust Control Plan for controlling fugitive dust. The Dust Control Plan shall be subject to the review and approval of AVAQMD and include the following strategies:	A. Submittal and approval of a Dust Control Plan. B. Implementation of dust control measures as described in the Dust Control Plan during construction.	Prior to issuance of grading permit During construction and during operations	Applicant Applicant	DRP / AVAQMD DRP/ AVAQMD

		<p>a. <u>Minimal Grading and Ground Disturbance:</u> The Project would perform the minimum amount of grading and disturb the minimum amount of existing vegetation to construct the Project. Generally, graded areas shall be limited to fire access/service roads, substations, water tanks, inverter, equipment, and switchgear pads, and retention basins. Clearing and grubbing may occur throughout the Site. The existing vegetation under the proposed solar panels will not be removed but may be mowed.</p> <p>b. <u>Construction Scheduling:</u> Grading activities would be temporarily halted and/or Site watering would be increased during wind speeds that exceed 25 miles per hour, or when visible dust plumes have the potential to be transported off of the Site.</p> <p>c. <u>Water Application:</u> During construction, the Project would apply water to control fugitive dust from the Site as necessary and required by the AVAQMD.</p> <p>d. <u>Soil Binders/Wood Mulch:</u> Soil binders or wood mulch would be applied if and as necessary.</p> <p>e. <u>Monitoring:</u> A qualified construction mitigation manager or delegate ("CMDM") would be onsite during all grading, excavation, storage, and backfill activities to ensure compliance with the approved Dust Control Plan. The CMDM would monitor all construction activities for visible dust plumes, and would promptly implement additional dust plume reduction measures in the event that such visible dust plumes are observed.</p>			
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		Additional measures to be implemented, as necessary, would include increased watering, application of dust palliatives, and/or scaled back construction activities up to and including temporary work cessation.			
Biological Resources					
22	BIO-1	<p>Pre-construction surveys:</p> <p>a. A pre-construction burrowing owl survey should be conducted no more than 14 days prior to the initiation of ground disturbance activities and a final survey should also be conducted no earlier than 24 hours prior to ground disturbance. If no burrowing owls are detected during the pre-construction survey, ground disturbance activities can proceed without further consideration of this species. If burrowing owls are detected during the take avoidance survey, additional avoidance and minimization measures would then be required, under the guidance of the California Department of Fish & Wildlife ("CDFW"), provided that mitigation acreage acquired for Swainson's hawk (if required) that is similar to the relatively low quality of the site will also be sufficient to replace lost burrowing owl habitat.</p> <p>b. Conduct a 30-day desert kit fox and American badger pre-construction survey prior to ground disturbance to identify any burrows on the Site. If any burrows are identified and determined to be inactive, a qualified biologist shall excavate such burrows by hand. If any burrows are actively being used as natal dens, a 250-foot buffer around such burrows shall be established until such burrows are no longer being used as natal dens. If any desert kit fox</p>	Field survey	Prior to construction	Applicant
					DRP / CDFW

		<p>burrows are actively being used, but not as natal dens, the desert kit fox may be encouraged to depart the site, provided that no "take" may occur, and once such burrows are inactive, they can be excavated to prevent further occupancy.</p> <p>c. To comply with the Migratory Bird Treaty Act (MBTA), if any ground disturbance is anticipated during the nesting bird season (February-August) the project proponent will initiate a breeding/nesting bird survey to ensure no nesting birds are impacted. If a nesting bird is detected, the area will be avoided and a 50-meter buffer will be installed until the nesting birds have fledged and have been observed to be foraging independently.</p> <p>d. A CNDDB form should be submitted for any burrowing owl and any other sensitive species encountered in order to provide the resource agency personnel and biological consultants with a better understanding of sensitive species distribution in this area.</p>				
23	BIO-2	Conduct a 30-day pre-construction survey of the Swainson's hawk nest location identified in CNDDB #2416. If no nest is identified, or if a nest is identified but subsequently determined to be unsuccessful, construction activities can proceed without further consideration of this species. If a Swainson's hawk nest is identified and successfully established, all construction activities shall be postponed until CDFW is consulted. If any mitigation land is required for Swainson's hawk, mitigation land for Phase 1 of the Project shall be obtained prior to ground disturbance for Phase 1 of the Project, and mitigation land for Phase 2 of the Project shall be	Field survey	Prior to construction	Applicant	DRP / CDFW

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		obtained prior to ground disturbance for Phase 2 of the Project.				
24	BIO-3	Construction workers should be provided with an information pamphlet on burrowing owl biology and (although unlikely to occur on the site) general desert tortoise biology, how to recognize and avoid burrowing owl and desert tortoises, authorized speed limits while working within the site, trash abatement and checking under parked vehicles and equipment prior to moving. If a burrowing owl or desert tortoise is detected on site, all construction activity would be suspended and the resource agencies notified to determine appropriate measures.	Provide information	During construction	Construction Manager	DRP
25	BIO-4	Provide a trash abatement program with sealed trash containers on site to prevent unwanted tortoise predators such as ravens and coyotes.	Provide sealed trash containers	During construction and operations	Construction Manager	DRP
26	BIO-5	Vehicle speed limits of 15 miles per hour on all project related access roads and work areas.	Enforce speed limits	During construction and operations	Construction Manager	DRP
27	BIO-6	Utilize existing roads, whenever possible, to minimize disturbance to potential habitat.	Utilize existing roads	During construction and operations	Construction Manager	DRP
28		Intentionally Omitted				
29	BIO-8	Following the completion of construction, Applicant will have a qualified biologist perform a survey twice per year to document avian mortality at the Project. Annually, the biologist will prepare a report documenting the findings from such surveys and will provide, or make available, such report to the County, CDFW, and United States Fish & Wildlife. If the biologist fails to find	Annually submit a report of avian mortality. If no mortalities are reported during a consecutive three year period further reports are no longer required.	One year after energization	Applicant	DRP, CDFW, United States Fish & Wildlife

		evidence of avian mortality for three (3) consecutive years, Applicant shall no longer be required to perform such surveys; provided, however, that in the event of a significant increase in aquatic insects at the Project (e.g., due to flooding), Applicant will perform additional surveys to identify avian mortality at the Project. During the winter months of the first year following the completion of Project construction, Applicant will survey the Project on a monthly basis, but such surveys may be conducted by Applicant's employees and contractors who have been properly trained to identify evidence of avian mortality. If evidence of avian mortality is found, a qualified biologist will be contacted to assess such findings.			
30	BIO-9	During the construction of the Project, (a) all excavations, holes, and trenches greater than two feet deep (if any) will be adequately covered to prevent entrapment of desert kit fox, and will be inspected by a biological monitor prior to initiating the workday; (b) when applicable, the Project will utilize a biological monitor to inspect all construction pipes, culverts, or similar structures (if any) greater than 4-inches diameter for kit fox prior to the structure being capped, buried, or moved; any kit fox found to be present within the structure must be allowed to move on its own accord; (c) domesticated dogs will not be allowed on the Site; (d) rodenticides will not be used on the Site; and (e) if the construction of Phase 2 of the Project results in an insufficient passage across the Site for desert kit fox, the perimeter fencing for Phase 2 of the Project will be raised at regular intervals one-foot above grade to permit the passage of desert kit fox across the Site.	Daily monitoring the construction site to assure implementation of the mitigation measure.	During construction	Construction Manager
					DRP

Cultural Resources					
31	CUL-1	In the unlikely event that historical, archaeological, or paleontological resources are identified on the Site during ground-disturbing activities, a qualified archaeologist or paleontologist (as appropriate) will assess the significance of any find and will have the authority to stop or divert the construction excavation as necessary. Work may proceed in other areas of the Site. A plan to mitigate any adverse impacts will be prepared and undertaken, and work may proceed on the Site once evaluation of the find is complete.	Evaluate any cultural resources discovered.	Applicant / Construction Manager	DRP
32	CUL-2	In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found during ground-disturbing activities, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). Such descendants shall complete their inspection within 48 hours of being granted access to the Site.	If human remains are discovered, contact County Coroner	Applicant / Construction Manager	DRP / Coroner
Hazards and Hazardous Materials					
33	HAZ-1	Prior to commencement of onsite ground-disturbing activities, Applicant shall obtain soil samples from the Site and test such samples for the presence of agricultural chemicals (insecticides, pesticides, and/or herbicides). If chemical levels are above regulatory standards, remediation and/or removal of contaminated soils in compliance with applicable local, state, and federal standards and requirements shall be conducted prior to Project	Preconstruction soil testing and compliance with applicable regulations.	Applicant / Construction Manager	LAFD

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		construction.				
Utilities and Service Systems						
34	UTIL-1	Construction activities on the Site shall be conducted in compliance with Chapter 20.87 (Construction and Demolition Debris Recycling and Reuse) of the Los Angeles County Code. A Recycling and Reuse Plan (RRP) must be submitted to the Los Angeles County Department of Public Works, Environmental Programs Division prior to grading permits being issued for each of Phase 1 and Phase 2 of the Project.	Submittal and approval of a RRP.	Prior to issuance of building permit.	Construction Manager	DPW



COUNTY OF LOS ANGELES FIRE DEPARTMENT

Fire Prevention Division – Land Development Unit

5823 Rickenbacker Road
Commerce, California 90040-3027
Office (323) 890-4243, Fax (323) 890-9783

DATE: January 8, 2014

SITE PLAN DATE: 11/22/13

TO: Department of Regional Planning
Zoning Permits - Anthony Cruz

PROJECT #: R2013-03397

LOCATION: 90th Street East and East Avenue F, Lancaster

FIRE DEPARTMENT SOLAR ARRAY FIELD CONDITIONS

General Comments:

1. The proposed project is "cleared" to proceed to public hearing.
2. The proposed solar array field requires a minimum of one entry/ exit location as noted on the site plan.
3. In addition to the interior perimeter Fire Department access road, the design of the solar array field necessitates the need for interior on-site Fire Department access roads going in the directions north to south and east to west as noted on the site plan.
4. A minimum of one water tank is required for the proposed solar array field. The water tank is to be located near the address side entry/ exit gates as noted on the site plan.
5. All Fire Protection facilities, including access and water, must be provided prior to and during construction. Please contact FPEA Wally Collins at (323) 890-4243 if there are questions regarding these comments

On-site & Off-Site Fire Apparatus Access Road Requirements:

1. The fire apparatus on-site & off-site access roads shall be installed and maintained in a drivable condition for the duration of the solar project.
2. The fire apparatus on-site & off-site access roads shall be installed prior to occupancy or operation of the facility.
3. The minimum roadway width within the solar array field is 20 feet, clear-to-the sky, with a center-line turning radius of 32 feet, with an inner radius of 22 feet and an outer radius of 42 feet, for each turn in the solar array field.
6. The fire apparatus on-site & off-site access roads for the solar array field shall have a soil compaction of 90%, OR the apparatus access road shall be excavated and re-compacted to 90%.
7. A perimeter interior roadway is required around the entire solar array field.
8. The design of the solar array necessitates additional interior on-site Fire Department access roads going in the directions north to south and east to west.

COUNTY OF LOS ANGELES FIRE DEPARTMENT

Fire Prevention Division-Land Development Unit

County Project #R2013-03397

January 8, 2014

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On-Site Ingress/ Egress Gates:

1. The on-site ingress/ egress gate shall be located on the address side of the property, and shall be set back 50 feet from the edge of the pavement.
2. The on-site ingress/ egress gate width shall be a minimum of 20 feet, clear-to-sky, with all gate hardware clear of the road way width.
3. The facility emergency contact information shall be provided with each limited access device, per LACoFD Regulation 5, and shall be clearly indicated with an appropriate placard at each ingress location. The minimum size of the placard shall be 12 inches X 12 inches.
4. Provide an approved "Fire Department Knox Lock" for each ingress/ egress gate.
5. The onsite ingress/ egress gates shall be in compliance with LACoFD Fire Prevention Regulation #5.
6. No interior gates permitted on the on-site access roads

Water & Water Tank Requirements:

1. This development requires the installation of one water tank with a minimum tank size of 10,000 gallons for Fire Department use only.
2. The water tanks shall be clearly identified for "Fire Department Use Only".
3. The water tanks shall be located near the ingress/ egress gate.
4. The water tanks shall be in compliance with Fire Department standards.
5. The water tank shall have a low level water local alarm which shall be in compliance with all applicable codes and regulations. The low level water local alarm can be battery operated.
6. The water tank shall have a Fire Department supply outlet of 2 ½ inches in diameter with National Standard threads. The supply outlet is to be located 14-24 inches above the finished grade, and is required to be protected by approved barricades.
7. If the outlet is not provided directly off of the tank, provide a 6 inch underground pipe to a 4 inch upright pipe with an outlet of 2 ½ inches with National Standard threads, which is required to be protected by barricades.

Electrical Equipment:

1. All electrical disconnect locations shall be clearly identified.
2. All electrical shall be in compliance with all applicable state and local codes.

COUNTY OF LOS ANGELES FIRE DEPARTMENT

Fire Prevention Division-Land Development Unit

County Project #R2013-03397

January 8, 2014

Page 2 of 3

Vegetation Management:

1. The clearance of vegetation shall be in compliance with the brush clearance regulation as defined by the Fire Code or as directed by the Fire Official.
2. The vegetation shall be trimmed to a maximum height of 6 inches within the boundaries of the solar array.
3. Electrical transformer vaults or structures shall have all vegetation cleared to mineral soil for a distance of 50 feet.



JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

CYNTHIA A. HARDING, M.P.H.
Acting Chief Deputy Director

ANGELO J. BELLOMO, REHS
Director of Environmental Health

TERRI S. WILLIAMS, REHS
Assistant Director of Environmental Health

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Michael D. Antonovich
Fifth District

January 30, 2014

TO: Anthony Curzi
Regional Planning Assistant II
Department of Regional Planning

FROM: Vicente Banada, REHS *V.B.*
Environmental Health Division
Department of Public Health

**SUBJECT: CUP CONSULTATION
PROJECT NO. R2013-03397
SOUTHWEST CORNER OF AVE F & 90TH ST EAST, UNINCORPORATED COUNTY
OF LOS ANGELES**

- ☒ Environmental Health recommends approval of this CUP
- ☐ Environmental Health does NOT recommend approval of this CUP.

The Department of Public Health – Environmental Health Division has reviewed the information provided for the project identified above. The proposed project is a solar photovoltaic generating facility of up to 7.45 megawatts in size, located in the unincorporated County of Los Angeles, on unimproved, vacant land zoned for Heavy Agricultural (A-2-1) development.

Prior to the Department clearing this project for public hearing, the requirements listed on the attached reports shall be satisfactorily fulfilled.

For questions regarding potable water and wastewater, please contact the individual listed on the letter for each respective program. For all administrative questions, please contact me at (626) 430-5581.

COUNTY OF LOS ANGELES ♦ DEPARTMENT OF PUBLIC HEALTH

5050 Commerce Drive, Baldwin Park, CA 91706

Date: January 30, 2014

Project No R2013-03397

Page 1 of 2

APN: 3307-016-012 and -013

Specific Requirements for Operation as Solar Farm

Generally, permanently installed restroom and potable water facilities are required to be provided at worksite locations. For the purpose of "Solar Farm" operation, qualifying applicants that meet the requirements of Cal-OSHA sanitation standards in Section 3360, Title 8, California Code of Regulations may purpose "*mobile sanitation facilities*" consistent with departmental standards established through Los Angeles County Code, Title 11.

The following requirements are based on provisions of Los Angeles County Code, Title 11 - Health & Safety, and Cal-OSHA sanitation standards in Section 3360, Title 8, California Code of Regulations.

Wastewater Disposal

1. Submit to Land Use Program a Mobile Sanitation Facility plan consistent with the Department's guidelines, titled, "Sanitation Facilities at Remote Worksites Location".

For questions regarding the wastewater disposal requirements, please contact Eric Edwards at (626) 430-5380.

Potable Water Supply

1. Submit to Drinking Water Program a descriptive plan explaining how potable water will be provided in a manner as to be readily accessible to employees. The plan shall identify the potable water source and method of dispensing. The plan shall also describe how drinking water containers are maintained, including the methods to prevent contamination of the drinking water.

For questions regarding the portable water requirements, please contact Richard Lavin at (626) 430-5380.

Noise

1. It appears that there will be a short term noise impact on the few residences adjacent or near the project boundaries during the construction phase of the project. To mitigate the short term impacts, applicant shall adhere to the requirements of the Los Angeles County Noise Control Ordinance, as contained in Chapter 12.08 of the Los Angeles County Code, Title 12. Limit construction activities to occur between the hours of 7am to 7pm (Monday through Saturday).

Dust

1. Dust emissions from the operations are not expected to be significant during the operational life of the project. However, it is recommended that during the construction phase of the project a dust suppression engineering techniques be applied through the implementation of a fugitive dust control

plan. Construction of the project will result in temporary increase in air emissions. Follow best management practices and technologies to minimize air borne dust.

For questions regarding noise and dust, please contact Robert Vasquez (213) 738-3220.

**Burden of Proof for Requested Conditional Use Permit
Antelope Valley Solar, LLC, Solar Photovoltaic Generating Facility**

The proposed solar photovoltaic project (the “Project”) is solar photovoltaic generating facility of up to 7.45 megawatts (MW) in size, located in the unincorporated County of Los Angeles, near the intersection of 90th Street East and East Avenue F, on unimproved, vacant land zoned for Heavy Agricultural (A-2-1) development. The Project will be constructed in phases with the first phase anticipated to be 3 to 5 MW in size, and the remaining phases being constructed thereafter (if at all) up to 7.45 MW. Once constructed, the Project will operate year-round, producing renewable electric power during daylight hours.

I. The requested Conditional Use Permit will not adversely affect the health, peace, comfort, or welfare of persons residing or working in the surrounding area.

A. The Project will help the state of California meet its Renewable Portfolio Standard goals. In accordance with applicable law, California investor-owned utilities are required to have 25% of their retail load met by renewable generation by 2016, and 33% by 2020. As a renewable resource, the Project will help satisfy these RPS requirements. In addition to the RPS compliance, renewable generation provides numerous benefits for the citizens of the state of California, including decreased dependence on foreign sources of fuel, a diversified generation portfolio, less exposure to variable-priced fuel costs, a reduction in greenhouse gas emissions and other air pollutants, and “green” jobs throughout the renewables supply chain.

B. The Project is appropriate for the site. The Project is located on unimproved, vacant land in the sparsely populated Antelope Valley. The Project site is zoned for Heavy Agriculture (A-2-1) use and is largely surrounded by agriculturally-, commercial, and industrial-zoned land. The site is not designated as farmland and has no apparent water source. Much of the area surrounding the Project site is vacant, with some isolated low density, rural residential development in the vicinity.

C. The Project will be a low-impact, passive land use.

Noise

Operation of the proposed Project would generate very minimal noise levels. The Project would generate electricity with panels mounted on fixed-tilt or very slow moving, silently rotating single-axis trackers. A maximum of two employees will make periodic trips to maintain the Project with most of the work being done remotely. Periodic maintenance will primarily consist of cleaning the photovoltaic panels and performing required maintenance, as necessary. Because of the passive nature of the on-site operations, the likelihood of noise disturbance for nearby properties is negligible. During the brief construction period, there will be typical construction noises during daytime hours. Although the construction activities associated with earth-moving equipment and other construction machinery would temporarily increase noise levels for adjacent land uses, these impacts will be temporary and will conform to applicable County noise ordinances.

Air Quality

During operation, the Project itself will generate no air emissions, and will, in fact, contribute to the reduction of emissions by replacing conventional sources of power generation such as coal and natural gas. However, a negligible volume of emissions will be produced from the occasional maintenance vehicles that come on-site to service the Project. Construction-related emissions, resulting from fugitive dust and construction equipment, will be generated during the construction period. The

fugitive dust emissions will be mitigated through implementation of a Fugitive Dust Mitigation Plan as required by the County, and construction equipment will comply with air pollution control requirements.

Hazardous Waste

During construction and operation, very limited quantities of hazardous materials would be utilized, including petroleum-based fluids and construction-related materials. Some of the electrical equipment on the Project site contain hazardous materials. However, these materials will be transported, handled, stored and disposed of in accordance with federal, state and local requirements, and will have no effect on the health of persons residing or working nearby.

Traffic

The majority of operations and monitoring for the Project facilities will be done remotely. On days when on-site employees are needed, up to two workers will travel to the site to operate and maintain the solar facilities. Therefore, there will be a negligible long-term traffic impact from the Project. Traffic generated during the construction phase would include worker vehicles and heavy trucks. Based on the existing roadway capacity and usage, it is anticipated that the Project will not have a significant impact even during the temporary construction period.

Aesthetic/Visual

The Project's solar facilities will have a low profile, with the majority of the Project comprising solar panels reaching a maximum height of approximately eight feet. The Project is consistent with the four sets of utility lines running along 90th Street West adjacent to the eastern boundary of the Project site, the utility lines along the northern and southern boundaries of the Project site, and the Redman Substation located approximately one (1) mile north of the Project site. With implementation of the proposed Project, the available views of the identified scenic resources would not change and would continue to be available from the streets and the surrounding area. Therefore, no impacts to scenic vistas would occur as a result of the proposed Project. The proposed Project would generate light predominantly from security and perimeter lighting. Lighting will consist of modern, low intensity, downward-shielded fixtures that are motion-activated, and will be directed onto the immediate site. Therefore, lighting impacts would be minimized.

Public Services

The Project would incrementally increase the need for fire and police services. However, the site is within the current service area of both these agencies, and the additional time and cost to service the site is minimal. The Project will not result in an incremental increase in population, and no increase in the need for government services, such as schools, roads, sanitation, etc.

Water Quality

The Project will not have a significant effect on ground or surface water quality. Potential soil erosion and drainage sedimentation will be minimized, and the Project will prepare and implement a Storm Water Pollution Prevention Plan in compliance with California's General Permits for storm water management during construction and operation. The Project will also not generate any wastewater that would be disposed of in a sewer or septic system.

Water Usage

During operations and maintenance, the proposed Project will use water trucked in from outside of the Antelope Valley groundwater basin and/or from a greywater source for the occasional washing of the PV panels. Washing would occur approximately twice per year. Similarly, during construction, the water used for dust control, soil compaction, and the mixing of concrete will be trucked in from outside of the Antelope Valley groundwater basin and/or from a greywater source. Sanitary needs during construction and operations will be met by portable facilities approved by the County Health Department. The proposed Project would therefore not impact any groundwater recharge area or groundwater supplies.

D. Development at the site will enhance the comfort and welfare of the surrounding community by creating new jobs.

Construction of the Project is anticipated to take 3 to 6 months to complete. At the peak of construction (approximately 1 month), the Project employ 50-70 individuals primarily drawn from the local community. Once operational, the Project will employ up to two (2) individuals to provide maintenance, repair, and other services required to ensure the Project continues generating power for up to thirty (30) years.

II. The Project will not be materially detrimental to the use, enjoyment, or valuation of other persons located in the vicinity of the site.

The proposed Project is compatible with the existing uses, enjoyment, and land valuations of its neighbors. The Project area is sparsely populated, and the Project will not interfere with other people's quiet enjoyment of their land. The Project will not produce significant emissions, noise, pollutants, or visual impacts that would adversely impact other uses, enjoyment or valuations. As described above, the Project will be a low-impact, passive use of the property.

III. The proposed Project will not jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

The proposed Project will provide substantial benefits for public health and the general welfare. The proposed photovoltaic Project will displace conventional sources of power generation that would create air pollution, thereby positively impacting public health. The implementation of renewable energy brings substantial benefits for the general welfare, including decreased dependence on foreign sources of fuel, a diversified generation portfolio, less exposure to variable fuel costs, a reduction in greenhouse gas emissions and other air pollutants, and "green" jobs throughout the renewables supply chain.

IV. The site of the proposed project is appropriate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping, and other development features and will fully integrate the proposed uses with the surrounding area.

The Project site is located in a sparsely populated area in the Antelope Valley, where the solar resources are some of the best in California. Detailed engineering has been performed to demonstrate that the approximately eighty acre site is appropriate in size and shape to accommodate the planned solar facilities and all other development features necessary to integrate the Project with the surrounding area.

V. The proposed Project is adequately served by nearby highways, streets, and other service facilities.

A. The area enjoys excellent access to major regional highways and streets. The highways and streets surrounding the proposed Project are of sufficient width and will not need improvement in order to carry the minimal traffic generated by the Project. The Project site is conveniently located approximately 9 miles east of California 14 and is located one (1) mile south of Avenue E on 90th Street West.

B. The Project will require minimal public or private service facilities and will be largely self-sufficient. The minimal ongoing water needs will be trucked in as necessary. Sanitary needs during construction and operations will be met by portable facilities approved by the County Health Department. Electrical power for Project auxiliaries will be supplied during non-generating hours by back feed from the existing electrical grid.

**FINAL INITIAL STUDY /
MITIGATED NEGATIVE DECLARATION**

**MITIGATION MONITORING AND REPORTING
PROGRAM, RESPONSE TO COMMENTS, AND ERRATA**

**ANTELOPE VALLEY SOLAR ENERGY PROJECT
UNINCORPORATED LOS ANGELES COUNTY, CALIFORNIA**

**PROJECT NO.: R2013-03397-(5)
CONDITIONAL USE PERMIT NO.: 201300170
ENVIRONMENTAL ASSESSMENT NO.: 201300290
SCH NO. 2014111022**

Prepared for: County of Los Angeles, Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012

Prepared by: Antelope Valley Solar, LLC
837 9th St, Suite D
Santa Monica, California 90403

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Revised Exhibit

Exhibit 3- 4 – Revised Site Plan and Details

Revised Appendices

Appendix A – Final Mitigation Monitoring and Reporting Program

Appendix G – Revised Hydrology, Water Quality, and Low Impact Development Reports

SECTION 1.0 INTRODUCTION

1.1 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA), the potential environmental effects of the proposed Antelope Valley Solar Energy Project (“Project”) have been analyzed in a Draft Initial Study/Mitigated Negative Declaration (“Draft IS-MND”) (SCH No. 2014111022), dated November 4, 2014.

Section 15074(b) of the State CEQA Guidelines states that, prior to approving a project, the lead agency must consider the proposed IS-MND together with any comments received during the public review process. The lead agency must adopt the proposed IS-MND, only if it finds on the basis of the whole record before it, that there is no substantial evidence that the project would have a significant effect on the environment and that the IS-MND reflects the lead agency’s independent judgment and analysis. Section 2.0, Response to Comments, includes all letters received during and after the close of the 30-day public review period, as well as the Los Angeles County (“County”) written responses to all comments received. Section 4.0, Errata, includes revisions to the text of the IS-MND either in response to a comment or in order to clarify information.

Section 15074(d) of the State CEQA Guidelines states that, when adopting an MND, the lead agency shall adopt a program for reporting on or monitoring the changes that it has either required in the project or made a condition of approval to reduce or avoid significant environmental effects. Section 3.0, Mitigation Monitoring and Reporting Program (MMRP), describes the mitigation program to be implemented by the County.

1.2 PUBLIC REVIEW OF IS-MND

In accordance with Section 15073 of the State CEQA Guidelines, the Draft IS-MND was subject to a 30-day public review period when submitted to the State Clearinghouse for review. The Draft IS-MND was made available for public review from November 10, 2014, through December 19, 2014. Consistent with Sections 15072(b) and 15072(d) of the State CEQA Guidelines, the Notice of Intent to Adopt a Mitigated Negative Declaration (“NOI”) was published in the *Antelope Valley Press* and *La Opinión* and is on file at the Los Angeles County Registrar-Recorder/County Clerk in the City of Norwalk. The NOI by itself or the Draft IS-MND and NOI was provided to 17 interested agencies and/or groups; hardcopies of the NOI and IS-MND were made available for review at the Los Angeles County Department of Regional Planning (LACDRP) Headquarters and the local public library during business hours; electronic files of the NOI and IS-MND were available online at <http://planning.lacounty.gov/>.

The County has reviewed all comments received from agencies, organizations and/or individuals related to the Draft IS-MND to determine whether any substantial new environmental issues have been raised. Based on the evaluation in the Draft IS-MND, together with all comments received, the County has determined that no substantial new environmental issues have been raised and that all issues raised in the comments have been adequately addressed in the Draft IS-MND or herein. All potential impacts associated with the proposed Project were found to be less than significant with incorporation of relevant mitigation measures, where applicable. Therefore, the proposed Project would not result in any significant impacts, and a Mitigated Negative Declaration in accordance with CEQA is the appropriate environmental document for the proposed Project.

Therefore, this document, combined with the Draft IS-MND, constitutes the Final IS-MND for the proposed Project. This document includes all directly received public comment letters, and the County

responses. The County of Los Angeles Planning Commission will consider the proposed IS-MND together with the comments received during the public review process, and can consider adoption of this Final IS-MND in connection with approvals for the Project.

1.3 PROJECT DESCRIPTION

Antelope Valley Solar, LLC ("Applicant") proposes to develop a 7.45 MWac solar photovoltaic ("PV") Project in two phases on approximately 72 (net) acres of land in north Los Angeles County (the "Site"). The Site consists of vacant agricultural land that was last farmed on or before 1974, and is identified by County Assessor Parcel Numbers: 3307-016-012 and 3307-016-013. The Site is zoned A-2-1 (Heavy Agricultural Use-One Acre Minimum Required Lot Area). A detailed description of the Project is provided in Section 3.0 of the Draft IS-MND.

The Project will be developed in two (2) phases. The first phase ("Phase 1") will generate approximately 4.45 megawatts of alternating current ("MWac"), and will be located on the northerly 35-40 acres of the Site. The second phase ("Phase 2") will generate approximately 3 MWac and will be constructed on the southerly portion of the Site. Applicant currently has a power purchase agreement only for Phase 1 of the Project. Each Phase of the Project will interconnect to Southern California Edison's ("SCE") distribution circuits located near the eastern boundary of the Site.

As used herein, the term Project shall mean the solar PV project as a whole, including both Phase 1 and Phase 2. The studies, surveys, reports, and analyses undertaken with respect to the Project and the Site, including the analysis set forth in this IS/MND, apply to the whole Project and whole Site in its and/or their entirety, and the CUP being sought for the Project applies to the Project and the Site as a whole, including both Phases thereof.

The major components of the Project are summarized and described as follows:

- A solar field of north-south rows of PV panels, mounted on either fixed-tilt or single-axis tracking systems on steel support structures;
- An electrical collection and inverter-transformer system that aggregates the output from the PV panels, inverts the electricity from direct current (DC) to alternating current (AC), and transforms the output voltage to 12.47 kilovolts ("kV");
- Circuits, meters, relays, circuit breakers, fuses, surge protectors, poles, and other interconnection facilities, equipment, and distribution upgrades required to connect the Project to SCE's distribution circuits, whether at the Site or SCE's Redman Substation located on Avenue E and 90th Street East;
- A meteorological data collection system(s) configured to collect meteorological information for the Project; and
- Civil infrastructure, including driveways, internal access roads, secure fencing, landscaping, retention basins, and water tank(s) for fire protection.

Each Phase of the Project is expected to be in operation for at least 20 years or longer if the Project remains economically viable. At the end of the economically useful life of the Project, the Site would be restored to its pre-developed state in accordance with County requirements and an approved Decommissioning Plan.

SECTION 2.0 RESPONSES TO COMMENTS

Letters commenting on the information and analysis in the Draft IS-MND were received from the parties listed below during the public review period.

Federal Agencies

- None

State Agencies

- California Department of Fish and Wildlife (CDFW), December 10, 2014
- California Department of Transportation, District 7 (CalTrans), December 8, 2014

Regional Agencies

- Antelope Valley Air Quality Management District (AVAQMD - November), November 14, 2014
- Antelope Valley Air Quality Management District (AVAQMD - December), December 10, 2014
- Lahontan Regional Water Quality Control Board (Water Board), December 17, 2014

Organizations

- County Sanitation Districts of Los Angeles County (LACSD), December 11, 2014
- Roosevelt Town Council (Town Council), December 16, 2014

Each letter listed above is included in this document, followed by the County response to each comment. Each comment letter has been divided into sequential numbered comments (e.g., 1, 2, 3), as shown on the enclosed letters. Each numbered comment corresponds to a matching numbered response.

In addition to the foregoing letters, the County received comments and testimony to the Project during a public hearing (the "Public Hearing") located near the Site at the Eastside Elementary School, 6742 East Avenue H, Lancaster, CA 93535, on December 11, 2014, from 5:00 pm to 7:00 pm. The County has included a transcript of the Public Hearing in the record for this Project to be considered by the Department of Regional Planning in connection with its approval of the Project. Section 2.1 (Topical Responses) of this Final IS-MND provides responses to some of the comments made at the Public Hearing.

2.1 TOPICAL RESPONSES

Topical responses are provided for issue areas where there were several public comments on the same topic. In order to reduce repetition, topical responses have been provided to address the following issues:

Topical Response No. 1: Dust Control

Topical Response No. 2: Aesthetic Impacts

2.1.1 TOPICAL RESPONSE NO. 1: DUST CONTROL

Comments have been made stating concerns about the proposed Project's contribution to the problem of fugitive dust emissions and blowing dust. Comments have noted severe dust storms that periodically occur in the area, as well as the problems of dust control in the region.

As discussed throughout the Draft IS-MND, the proposed Project has many features to prevent significant direct or cumulative impact from fugitive dust emissions as follows:

As described in Section 3.5 of the Draft IS-MND, during construction, the Project would control fugitive dust pursuant to a Dust Control Plan in accordance with the Antelope Valley Air Quality Management District's (AVAQMD's) Rule 403 (see MM AQ-1). Additionally the Project would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) as required by the State Water Resources Control Board's Construction General Permit, which would further control water and wind erosion during construction.

Importantly, the Dust Control Plan must be flexible to accommodate for changing weather and wind circumstances, and includes requirements of water and/or other erosion control measures "as needed" in order to ensure attainment of the performance standard for prohibition of "the presence of such dust remains visible in the atmosphere beyond the Property Line of the emission source," per Antelope Valley AVAQMD's Rule 403, Fugitive Dust. The Dust Control Plan and SWPPP would incorporate a number of strategies during construction to control fugitive dust due to high winds from the Site, including the following:

- Minimal Grading and Ground Disturbance: The Project would perform the minimum amount of grading and disturb the minimum amount of existing vegetation to construct the Project. The existing vegetation in all other areas would be mowed to a height consistent with vegetation management requirements and left in place.
- Construction Scheduling: Grading activities would be temporarily halted and/or Site watering would be increased during wind speeds that exceed 25 miles per hour, or when visible dust plumes have the potential to be transported off of the Site.
- Water Application: During construction, the Project would apply water to control fugitive dust from the Site as necessary and required by the AVAQMD.
- Soil Binders/Wood Mulch: Soil binders or wood mulch would be applied if and as necessary.
- Monitoring: A qualified construction mitigation manager or delegate ("CMM") would be on-site during all grading activities to ensure compliance with the approved Dust Control Plan. The CMM

would monitor all construction activities for visible dust plumes, and would promptly implement additional dust plume reduction measures in the event that such visible dust plumes are observed. Additional measures to be implemented, as necessary, would include increased watering, application of dust palliatives, and/or scaled back construction activities up to and including temporary work cessation.

Comments have been raised that the dust-control measures specified in Dust Control Plans approved by AVAQMD for other solar projects in the Antelope Valley have not been effective, and there have been emissions of fugitive dust that are detrimental to the population surrounding these other project sites. Whether the production of fugitive dust at these project sites is because of the effectiveness (or lack thereof) of the measure itself, as stipulated in that Dust Control Plan, or how the measure was implemented is unknown. It is anticipated that the AVAQMD, in light of the recent high wind events and experience with ongoing construction projects, particularly those that have necessitated the issuance of violations pursuant to Rule 403, will be especially diligent in their review of the proposed Project's Dust Control Plan, and will not approve the Dust Control Plan until they are satisfied that the plan contains measures that will result in avoidance of fugitive dust violations.

2.1.2 TOPICAL RESPONSE NO. 2: AESTHETIC IMPACTS

Comments have been made about the need for landscaping and screening around the Project to mitigate the visual impact of the Project. Several sections of the Draft IS-MND address the visual impact of the Project. For instance, as stated in Section 4.1.2(d) of the Draft IS-MND:

While the Project would not affect any designated scenic vistas, the Project involves the installation of a solar array and related appurtenances on currently undeveloped land. Thus, changes in the visual characteristics of the Site would occur. The proposed PV panels would be placed on mounting structures and are anticipated to reach approximately six to eight feet above the ground. If a tracking system is implemented, the top height of the panels would vary slightly throughout the day as the panels rotate to track the movement of the sun across the sky. The tallest components of the Project would be higher than eye-level and, therefore, the solar facility would obstruct views through the Site for viewers adjacent to the Site on adjacent roadways.

The lands surrounding the Site are largely open space and sparsely developed. Relatively few people are traveling on the roads adjacent to the Site at any given time. The Site is not located near any heavily visited land uses and would not be viewed regularly by the general public. The Project and associated fencing would not degrade or obstruct views of the surrounding mountains and buttes from the vantage points surrounding the Site. Nevertheless, the visual change in character of the Site from open space to developed solar facilities would be considered a significant impact.

Considering the mix of existing surrounding land uses (i.e., open space, rural development, agriculture, and utility infrastructure), implementation of the Project would be generally compatible with the character of the existing surrounding land uses. The utility-related function and aesthetic of the Project would not substantially degrade the character of the surrounding area. Per the Los Angeles County Code, electric generating plants are a conditionally allowed use in the Heavy Agricultural (A-2) zone upon obtaining a CUP, which shows that the County generally considers it to be a compatible use in the area. Further, "utility and communication installations" are allowed uses in the Non-Urban 1 land use category of the Antelope Valley Areawide General Plan (LACDRP 1986). There is existing electrical infrastructure in the area, including (a) SCE's transmission and distribution circuits on 90th Street East, Avenue F, and Avenue F-8, (b) SCE's Redman Substation at Avenue E and 90th Street East, and (c) the overhead telephone and/or cable circuits near and along the Site.

MM AES-1 requires the preparation of a Landscape Plan, subject to the review and approval of the

County, mandating the planting of drought-tolerant plants along the portions of the perimeter fence parallel to 90th Street East, and the northern and southern 500-foot portions of 87th Street East. This landscaping would provide a visual buffer between the public roadways and the Project, and views into the Site would be obscured and naturalized through the use of the required landscaping along the perimeter fencing. Implementation of MM AES-1 would reduce the visual impacts of the onsite solar array to less than significant.

The property north of the Site includes Avenue F (a secondary County road) and LACSD land used for crop circle farming, and a landscaping buffer would be unnecessary. The property south of the Site includes Avenue F-8 (an unpaved, secondary County road) and vacant, unused land owned by LACSD, and likewise, a landscaping buffer would be unnecessary. Finally, the property west of the Site (other the north and south 500-foot portions of the western border of the Site) includes 87th Street East (an unpaved, and undedicated County road not suitable for vehicular use) and vacant, unused land owned by either private individuals or LACSD, and a landscaping buffer would be unnecessary.

Comments were received that expressed concern that any landscaping planted along the eastern and western boundaries of the Project would not survive the dry environment near the Site, and requesting that screening be considered in lieu of or together with landscaping. In connection with any screening, comments were received requesting that such screening be suitable to withstand the dry, hot, and windy climate in the area near the Site. In response to these comments, Applicant has revised MM AES-1 to the following:

MM AES-1: The Project shall incorporate either (a) drought-tolerant (native or non-native) vegetative landscaping periodically spaced, and/or (b) fence screening that is suitable to withstand the typical weather and climate conditions near the Site (which, for clarity, will not include slats), in either case installed along the portions of the perimeter fence parallel to 90th Street East and parallel to the northern and southern 500-foot portions of 87th Street East. The landscaping or screening parallel to the perimeter fencing for Phase 1 of the Project will be accomplished with Phase 1 of the Project, and the landscaping or screening parallel to the perimeter fencing for Phase 2 of the Project will be accomplished with Phase 2 of the Project. A **Perimeter Fence Screening/Landscape Plan shall be prepared by Applicant and reviewed and approved by the County. In connection with any landscaping installed, irrigation via water trucks will be conducted until the landscaping is established.**

2.2 State Agencies

- California Department of Fish and Wildlife (CDFW), December 10, 2014
- California Department of Transportation, District 7 (CalTrans), December 8, 2014



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director



December 10, 2014

Mr. Anthony Curzi
Los Angeles County Department of Regional Planning
320 West Temple Street, Room 1348
Los Angeles, CA 90012
acurzi@planning.lacounty.gov

Subject: Comments on the Initial Study/Mitigated Negative Declaration for the Antelope Valley Solar Renewable Energy Project, Los Angeles County (SCH# 2014111022).

Dear Mr. Curzi:

The California Department of Fish and Wildlife (Department) has reviewed the Initial Study and Mitigated Negative Declaration (IS/MND) prepared by Los Angeles County Department of Regional Planning (Lead Agency) for the proposed construction of the Antelope Valley Solar Renewable Energy Project (Project). The proposed Project is located on approximately 80 acres in unincorporated Los Angeles County south of East Avenue F and west of 90th Street East. The Project would construct and operate a 7.45 megawatt (MW) solar photovoltaic (PV) electrical generation facility in two phases. Phase 1 would generate approximately 4.45 MW of electricity while Phase 2 of the Project will generate approximately 3 MW.

Department Jurisdiction. The following comments and recommendations have been prepared pursuant to the Department's authority as a Trustee Agency with jurisdiction over natural resources potentially affected by the project (California Environmental Quality Act [CEQA] Guidelines § 15386) and as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA – Chapter 1.5 of the Fish and G. Code) and/or require a Lake and Streambed Alteration Agreement (Fish and G. Code § 2050 *et seq.*).

1. Renewable Energy and Avian Impacts. The effects of utility-scale renewable energy is an emerging issue and of increasing concern to the Department. The Department is concerned that the proposed Project has the potential to significantly impact bird and bat species. Utility-scale renewable energy presents a variety of potential challenges including, but not limited to, direct and indirect effects of loss of foraging habitat, loss of breeding habitat, habitat fragmentation, direct mortality, increased anthropogenic pressures, and navigational disruptions during migration.

} 1

The Project is proposed to be located within the Antelope Valley Important Bird Area (IBA) identified by the National Audubon Society, in part, due to its importance to migratory birds. Research suggests that flat, reflective surfaces (e.g., solar panels) polarize natural light (Horváth, *et al.*, 2009). The artificial surfaces studied by Horváth *et al.* appear to be either perceptively indeterminate from natural water bodies or otherwise present themselves as an attractant across multiple animal taxon. This phenomenon may serve as an ecological trap attracting taxon directly to the reflective surface in addition to attracting predators. Solar panels may modify the behaviors of bat prey

} 2

Conserving California's Wildlife Since 1870

species in addition to the affecting the bats' innate recognition of highly reflective surfaces as a body of water (Grief and Siemers, 2010). The Department is concerned that the potential attraction could result in direct collisions with the solar panels, mortality, and injury. The Department recommends the IS/MND include additional studies of bat usage and migratory bird movements through the Project area, potential impacts, and include mitigation for any identified significant impacts.

The Department recommends the Lead Agency require a scientifically rigorous Bird and Bat Conservation Strategy (Strategy) as a component of the Project. The Strategy should be implemented prior to construction (to establish a baseline) but should also include the operations phase of the Project, including an adaptive management component. The Strategy would provide valuable insight for adaptive management strategy for the Project and better inform the community of the potential impacts of utility-scale renewable energy projects.

The Department Recommends that the MND incorporate: 1) a nesting bird monitoring component for the Project; and 2) a full-term Bird and Bat Conservation Strategy, as project mitigation measures. As an adaptive management strategy, both plans should require reporting to the Lead Agency, the Department, and the United States Fish and Wildlife Service. In addition to this measure, the Department also suggests that an adaptive management component of the Project include partitioning of the solar panel technology utilizing a non-reflective grid pattern (similar to Horváth, et al, 2009), and experimental application of film overlays designed to mitigated the Project's reflectivity.

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2. Burrowing Owl Surveys. The IS/MND includes mitigation measure BIO-1 which requires a "...preconstruction burrowing owl survey [which] should be conducted no less than 14 days prior to the initiation of ground disturbance activities and a final survey should also be conducted no earlier than 24 hours prior to ground disturbance". To avoid conducting surveys too far in advance of ground disturbing activities, the Department recommends that the surveys be conducted no more than 14 days prior to ground disturbing activities, followed by a final survey conducted no earlier than 24 hours prior to ground disturbance. In addition to the mitigation identified in the IS/MND, the Department recommends that compensatory mitigation is provided for burrowing owl for the Department's *Staff Report on Burrowing Owl Mitigation (2012)*.

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3. Desert kit fox. Take (Fish & G. Code, § 86) of desert kit fox (*Vulpes macrotis*) if prohibited (Cal. Code Regs., tit. 14, § 460). The MND should include mitigation measures to avoid take of desert kit fox including entrapment (e.g., open trenches, or uncovered pipes) and direct pursuit. Based on the Project's biological habitat assessment (Phoenix Consulting 2014), two active desert kit fox burrows were identified. The loss of burrows and increased habitat fragmentation may permanently displace the desert kit fox currently utilizing the Project site. The Department is concerned that the influx of development may negatively impact desert kit fox. The Department recommends that the Lead Agency incorporate additional kit fox mitigation measures including:

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- a. All excavations, holes and trenches greater than 2-feet deep to be adequately covered to prevent entrapment. All excavations should be inspected by a

biological monitor prior to initiating the workday and immediately prior to the end of the workday.

- b. Utilize a biological monitor to inspect all construction pipes, culverts, or similar structures greater than 4-inches diameter for kit fox prior to the structure being capped, buried or moved. Any kit fox found to be present within the structure must be allowed to move on its own accord.
- c. Disallow any domesticated dogs on the Project site.
- d. Disallow the use of rodenticides on the Project site.
- e. Ensure that all perimeter fencing is desert kit fox permeable.

5 (con't)

4. Swainson's Hawk. Although no Swainson's hawk nests were found on site (Phoenix Consulting 2014), the biological assessment found that the Project site supports limited Swainson's hawk foraging potential. One Swainson's hawk nest (California Natural Diversity Database occurrence number 2416) is known immediately adjacent to the Project site which was last utilized in July 2012. The Department released guidance (*Swainson's Hawk Survey Protocols, Impact Avoidance, and Minimization Measures for Renewable Energy Projects in the Antelope Valley of Los Angeles and Kern Counties, California*, 2010) in which the Department considers a Swainson's hawk nest site to be active if it was used at least once within the past five years. The Department recommends the Lead Agency consider impacts to suitable habitat or individual birds within a five-mile radius of an active nest significant. In addition, the loss of significant foraging habitat for a given nest territory may have the potential for "take" as defined by Fish and Game Code section 86. The Department recommends that the Project mitigate for the loss of Swainson's hawk foraging habitat.

6

5. Project Decommissioning. The IS/MND projects an anticipated period of operation between 20-35 years. The IS/MND and Decommissioning Plan should include a discussion of the repeated impacts associated with the decommissioning of the Project. The Department requests that the Decommissioning Plan be circulated for public review and comment.

7

Thank you for this opportunity to comment on the IS/MND. Questions regarding this letter and further coordination regarding these issues should be directed to Eric Weiss, Senior Environmental Scientist (Specialist) at (858) 467-4289 or Eric.Weiss@wildlife.ca.gov.

Sincerely,

Betty Courtney

Betty Courtney
Environmental Program Manager I
South Coast Region

ec: Erinn Wilson, CDFW, Los Alamitos
State Clearinghouse, San Diego

Mr. Anthony Curzi
Los Angeles County Department of Regional Planning
December 10, 2014
Page 4 of 4

References:

California Department of Fish and Game, California Wildlife Habitat Relationships website:
(<http://www.dfg.ca.gov/biogeodata>).

California Natural Diversity Database, website: <http://www.dfg.ca.gov/biogeodata>
Grief, Stefan and Siemers, Björn M. "Innate recognition of water bodies in echolocating bats."
Nature Communications November 2010.

Horváth, Gábor; Kriska, György; Malik, Péter; and Robertson, Bruce, 2009. "Polarized light
pollution: a new kind of ecological photopollution." *Front Ecol Environ* 2009; 7(6): 317-325, doi:
10.1890/080129.

Renewable Energy Action Team, Best Management Practices and Guidance Manual, desert
renewable energy projects: <http://www.energy.ca.gov/2010publications/REAT-1000-2010-009/REAT-1000-2010-009.PDF>.

Young, Ryan; Brazil, Tina. "Biological Habitat Assessment & Focused Burrowing Owl Survey
and Rare Plant Survey for Proposed Up to 7.45 MW AC Photovoltaic Solar Array Antelope
Valley Solar Project." Phoenix Biological Consulting, 2014.

2.2.2. California Department of Fish and Wildlife (CDFW), December 10, 2014

Response CDFW – 1

CDFW has expressed concern that utility-scale renewable energy projects generally present challenges associated with loss of foraging habitat, loss of breeding habitat, habitat fragmentation, direct mortality, increased anthropogenic pressures, and navigational disruption during migration. With respect to the Project, such matters are not a significant concern.

As describe in Section 3.4 of the Draft IS-MND, the Site is approximately 80 acres in size. Phase 1 of the Project will be located on the north approximately 35-40 acres of Site, and Phase 2 of the Project (if developed) will likely consist of less than 35 acres of the southern portion of the Site. Accordingly, the Project (and each Phase thereof) is small by comparison to other utility-scale renewable projects located in the County.

As described in Section 4.19.2(c) of the Draft IS-MND, other than the Project, there are no known past, current, or probable future renewable energy projects under development or in the entitlement process within a three (3) mile radius of the Site. The nearest existing PV project to the Site is small (approximately 20 acre) solar PV facility near Avenue L-8 and 90th Street East, approximately 6.5 miles south of the Site in the City of Palmdale. Due to the constrained nature of SCE's utility grid in the area around the Site, there is not likely to be many (if any) additional PV projects constructed in the area other than the Project. Accordingly, there are no cumulative impacts beyond the individual impacts of the Project, and the Project is not (and is unlikely to be) part of a larger development of renewable energy projects in the area.

As described in Section 4.4.1 of the Draft IS-MND, the Site consists of heavily-modified fallow agricultural fields. Soils on the Site are hard-packed with very sparse vegetation. The soil types consist of Rosamond loam (95 percent) and Rosamond loam, saline-alkali (5 percent). Rosamond loam is described as non-saline to very slightly saline, well-drained alluvium derived from granite. Rosamond loam, saline-alkali soil is described as very slightly saline to moderately saline, well-drained alluvium derived from granite. Existing vegetation is desiccated and low growing. Approximately 40-50 percent of the Site is denuded of vegetation. Vegetation on the Site consists of native annual and perennial grassland and is not considered to be special status of vegetation. There are no trees on the site or other suitable nesting locations. The vegetation community includes tumbleweed (*Salsola* sp.), less than twelve bushes of saltbush (*Atriplex spinifera*), and Mediterranean grass (*Schismus* sp.). There are no wetlands, streams, streambeds, or other bodies of water on or near the Site, although this region is subject to seasonal flooding.

The Site is currently open for wildlife passage, other than minimal restrictions of the roads bounding the north, south, and east of the Project. Project implementation would include the installation of chain-link fencing around the perimeter of the Project. The land around the Site is vacant, consisting of several miles of opens space without substantial residential or commercial development. The Site itself offers no greater value for wildlife movement relative to the surrounding land in the vicinity. There is no indication of concentrated movement through the Site or adjacent lands. The Project would have minimal impact on regional wildlife movement or with the movement of any native resident in areas surrounding the Site.

Accordingly, the Site provides minimal foraging or breeding habitat, and given the surrounding land uses, the Project would provide less than significant habitat fragmentation. Additionally, given its relatively small size, and the lack of other solar photovoltaic projects in the area, the Project should not be considered a significant development relative to the other land uses in the area.

Response CDFW – 2

As described in Section 3.1 of the Draft IS-MND, the Site is located at the southwest corner of East Avenue F and 90th Street East. CDFW has identified the Site as being within the Antelope Valley Important Bird Area (“IBA”) per the maps published by the National Audubon Society, and while technically accurate, the Site is actually located at the northeastern border of the IBA, which begins at East Avenue E-8 and 90th Street East, approximately 2,600 feet north of the Site.

Response CDFW – 3

CDFW expressed concern, and other have theorized, that solar panels can attract species that mistake the panels for bodies of water, potentially leading to increased collision-related and other risks. For this reason, the phenomenon is sometimes colloquially referred to as the “fake lake effect.” Some postulate that this phenomenon could be attracting birds to solar project sites thereby exposing the birds to greater risk of impacts such as potential collision with project infrastructure, the possibility of being stranded within site fencing once they land, or other forms of distress. It may be that, when viewed from a distance or an elevated position, solar panel arrays appear to be a water body to migrating water birds during daylight hours or on nights when the moon is full; however, no empirical research has drawn any definite conclusions on this matter. The causes of avian injuries and fatalities at commercial-scale solar projects are being evaluated by the USFWS, CDFW, and others. However, as yet, no formal studies have been conducted at commercial-scale solar projects that establish a clear causal link between such projects and the types of avian mortality and injury documented on existing solar project sites.

Much of what is known about avian collision risk with solar facilities in California is based on preliminary avian monitoring data from two projects in Riverside County: the Desert Sunlight Solar Farm, a PV project located in the Mojave Desert, and the Genesis Solar Energy Project, a thermal solar project in the Colorado Desert. However, the Genesis project uses a technology that employs mirrors the reflect light (as opposed to PV panels), and so mortality data from that project may not be relevant. Monitoring evidence from both projects suggests that common and special-status migratory birds could be attracted to the project site and that limited injury and mortality could be expected (Genesis Solar, LLC, 2013a, 2013b, and 2013c; Ironwood Consulting, Inc., 2012, 2013a, 2013b). Although the deaths at these facilities have not been determined to be the fault of the respective solar development, the potential is being investigated. Even with monitoring data from other PV projects in the state, there remains a great deal of uncertainty regarding the extent to which birds might be impacted by the project because: 1) the mortality data from the other projects has been collected over a relatively short period of time and still is being evaluated; 2) in most cases, the cause of death is not clear; and 3) mortality information from one project location is not necessarily indicative of the mortality that might be found at another project location.

Solar photovoltaic panels generate electricity by absorbing solar energy (i.e. sunlight). Accordingly, solar photovoltaic panels are made with “high transmission, low iron” glass with low reflectance values to minimize the reflection (and maximize the absorption) of sunlight. Additionally, when mounted on single-axis tracking systems, solar pv panels are flat only during the middle of the day, and when viewed from above, would not appear to resemble a body of water when the panels are facing east in the mornings or west in the afternoons. However, solar panels do reflect some light at low angles, and birds may not approach water bodies from above.

The acreage footprint of the Project is more than 100 times smaller than the commercial-scale solar facilities for the Desert Sunlight Solar Farm or Genesis Solar Energy Project, and the Project is not located near a body of water (except for the potential of seasonal flooding). It can be postulated that the potential effect of the commercial-scale solar farms discussed above is directly related to their size and the likelihood that aquatic birds will be in the area, and thus, a smaller solar farm away from any lakes, streams, or other

water areas would have a decreased likelihood of affecting migratory bird species. Therefore, the potential for impacts to migratory wildlife are considered less than significant.

Although for the reasons stated above, the impact of the Project to birds and bats is less than significant, Applicant has agreed to monitor the Project for avian mortality by having a qualified biologist survey the Project twice per year to document bird mortality. Accordingly the following MM is incorporated into Section 4.4.3 of the Draft IS-MND as MM-BIO-08:

MM BIO-08: Following the completion of construction, Applicant will have a qualified biologist perform a survey twice per year to document avian mortality at the Project. Annually, the biologist will prepare a report documenting the findings from such surveys and will provide, or make available, such report to the County, CDFW, and United States Fish & Wildlife. If the biologist fails to find evidence of avian mortality for three (3) consecutive years, Applicant shall no longer be required to perform such surveys; provided, however, that in the event of a significant increase in aquatic insects at the Project (e.g., due to flooding), Applicant will perform additional surveys to identify avian mortality at the Project. During the winter months of the first year following the completion of Project construction, Applicant will survey the Project on a monthly basis, but such surveys may be conducted by Applicant's employees and contractors who have been properly trained to identify evidence of avian mortality. If evidence of avian mortality is found, a qualified biologist will be contacted to assess such findings.

Additional References

Genesis Solar, LLC. 2013a. Genesis Solar Energy Project Eastern Riverside County, California, Monthly Compliance Report #33 [to the California Energy Commission]. July 2013.

2013b. Genesis Solar Energy Project Eastern Riverside County, California, Monthly Compliance Report #34 [to the California Energy Commission]. August 2013.

2013c. Genesis Solar Energy Project Eastern Riverside County, California, Monthly Compliance Report #35 [to the California Energy Commission]. September 2013.

Ironwood Consulting, Inc., 2012. 2012 Annual Report for Biological Resources Monitoring First Solar Desert Sunlight Solar Project, Riverside County BLM Case File Number CACA-48649 Biological Opinion# FWS-ERIV-08B0789-11F0041, 1 January – 31 December 2012.

2013a. Desert Sunlight Solar Project Weekly Progress Report: Biological Resources. Desert Center, California. October 7 - October 13, 2013.

2013b. Desert Sunlight Solar Project Weekly Progress Report: Biological Resources. Desert Center, California. October 28 - November 3, 2013.

Response CDFW – 4

CDFW has requested a modification to the MM BIO-1(a) with respect to the timing of the preconstruction burrowing owl survey on the Site. Accordingly, MM BIO-01(a) set forth in Section 4.4.3 of the Draft IS-MND is revised to the following:

MM BIO-01: Pre-construction surveys:

- a. A pre-construction burrowing owl survey should be conducted no ~~less~~ **more** than 14 days prior to the initiation of ground disturbance activities and a final survey should also be conducted no earlier than 24 hours prior to ground disturbance. If no burrowing owls are detected during the pre-construction survey, ground disturbance activities can proceed without further consideration of this species. If burrowing owls are detected during the take avoidance survey, additional avoidance and minimization measures would then be required, under the guidance of the CDFW,

provided that mitigation acreage acquired for Swainson's hawk (if required) that is similar to the relatively low quality of the site will also be sufficient to replace lost burrowing owl habitat.

The remainder of MM BIO-1 shall remain unchanged.

Response CDFW – 5

CDFW states that it is "concerned that the influx of development may negatively impact desert kit fox." However, as described above, given the small size of the Project and the miles of open space surrounding the Site, such impact will be less than significant. Notwithstanding the foregoing, Applicant has agreed to the inclusion of the following mitigation measures related to desert kit fox.

MM BIO-09: During the construction of the Project, (a) all excavations, holes, and trenches greater than two feet deep (if any) will be adequately covered to prevent entrapment of desert kit fox, and will be inspected by a biological monitor prior to initiating the workday and immediately prior to the end of the workday; (b) when applicable, the Project will utilize a biological monitor to inspect all construction pipes, culverts, or similar structures (if any) greater than 4-inches diameter for kit fox prior to the structure being capped, buried, or moved; any kit fox found to be present within the structure must be allowed to move on its own accord; (c) domesticated dogs will not be allowed on the Site; (d) rodenticides will not be used on the Site; and (e) if the construction of Phase 2 of the Project results in an insufficient passage across the Site for desert kit fox, the perimeter fencing for Phase 2 of the Project will be raised at regular intervals one-foot above grade to permit the passage of desert kit fox across the Site.

Response CDFW – 6

Section 4.4.2 of the Draft IS-MND provides a detailed description of the impact of Project to the Swainson's hawk near the Site. In summary, the Site is heavily-disturbed, void of any trees or other nesting locations, and contains low quality foraging habitat for Swainson's hawk and other raptors. No Swainson's hawk or other sensitive raptors have been observed on the Site. Notwithstanding the foregoing, Applicant has agreed to modify MM BIO-07 to provide mitigation relative to Swainson's hawk.

MM BIO-07: Applicant has agreed to pay an in-lieu fee to a non-profit organization in support of a project that assists in the preservation of burrowing owl and Swainson's hawk habitat (the "In-Lieu Project"). The amount of the in-lieu fee shall be acceptable to the County and determined based on an assessment of the benefit of the In-Lieu Project to the preservation of the burrowing owl and Swainson's hawk habitat and the loss of the potential burrowing owl and Swainson's hawk habitat on the Site, which is acknowledged to be low quality habitat for burrowing owl and Swainson's hawk. As an example, an In-Lieu Project that provides fencing around a conservation area that contains high-quality habitat for burrowing owl and Swainson's hawk may be the type of In-Lieu Project acceptable to the County. The in-lieu payment shall be made prior to ground disturbance for Phase 1 of the Project, and such payment shall satisfy this mitigation measure for both Phase 1 and Phase 2 of the Project.

Response CDFW – 7

The Draft IS-MND contains a full environmental assessment of all impacts associated with Project implementation, including impacts associated with the implementation of the Decommissioning Plan described in Section 3.7 of the IS-MND. Applicant will submit the Decommissioning Plan to the County for review and approval, following which the County may circulate the Decommissioning Plan for public review.

DEPARTMENT OF TRANSPORTATION
 DISTRICT 7 OFFICE OF TRANSPORTATION PLANNING
 100 S MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE: (213) 897-9140
 FAX: (213) 897-1337
www.dot.ca.gov



*Sevens through
 Help save water*

December 08, 2014

Mr. Anthony Curzi
 Los Angeles County
 Department of Regional Planning
 320 West Temple Street, Room 1348
 Los Angeles, CA 90012

RE: Antelope Valley Solar Renewable
 Energy Project
 Mitigated Negative Declaration
 SC11#2014111022, IGR#14112011
 Vic. LA/ SR-14/ PM R73

Dear Mr. Curzi:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project is proposing to develop a 7.45 MWac solar photovoltaic project in two phases. Applicant currently has a power purchase agreement only for Phase 1 of the Project. Each Phase will interconnect to Southern California Edison's distribution circuits near the eastern boundary of the Site.

Caltrans noted on page 93, the Project indicated that for "oversized transport vehicles on State highways, if required, would need to obtain a transportation permit from Caltrans." Please be advised that any work or traffic control that is conducted on, over, or through State ROW requires an encroachment permit issued by Caltrans. Also, we recommend that large size truck trips be limited to off-peak morning and evening commute period.

Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects need to be designed to discharge clean run-off water. Additionally storm water run-off is not permitted to discharge onto State highway facilities.

If you have any questions, please feel free to contact me at (213) 897-9140 or project coordinator Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

DIANNA WATSON
 Branch Chief, Community Planning & LD IGR Review

cc: Scott Morgan, State Clearinghouse

2.2.3. California Department of Transportation, District 7 (CalTrans), December 8, 2014

Response CalTrans –1

As described in Sections 4.17.2 and 4.17.2 of the Draft IS-MND, oversized transport vehicles will obtain a transportation permit from Caltrans. The Project is not located near any State ROW, and no work or traffic control will be conducted on, over, or through a State ROW.

Response CalTrans –2

As described in Section 4.7.2 of the Draft IS-MND, the potential impacts of soil erosion on the Site would be minimized through a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The SWPPP would prescribe temporary Best Management Practices (BMPs) to control wind and water erosion during and shortly after construction of the Project. The impact on soil erosion is less than significant, and no further analysis is warranted.

2.3 Regional Agencies

- Antelope Valley Air Quality Management District (AVAQMD - November), November 14, 2014
- Antelope Valley Air Quality Management District (AVAQMD - December), December 10, 2014
- Lahontan Regional Water Quality Control Board (Water Board), December 17, 2014



Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heuston, Executive Director

In reply please refer to AV1114/097

November 14, 2014

Anthony Curzi
Los Angeles County
Department of Regional Planning
Zoning Permits North Section
Room 1348
320 West Temple Street
Los Angeles, CA 90012



Project: Draft Initial Study - Mitigated Negative Declaration for the Antelope Valley Solar Renewable Energy Project, Project # R2013-03397-(5), CUP # 201300170.

Dear Mr. Curzi:

The Antelope Valley Air Quality Management District (District) has reviewed the Draft Initial Study - Mitigated Negative Declaration for the Antelope Valley Solar Renewable Energy Project, Project # R2013-03397-(5), CUP # 201300170. The proposed project includes construction and operation of a 7.45 MWac solar photovoltaic facility in two phases. The first phase (Phase I) encompassing approximately 40 acres and generating 4.45 megawatts of power while the second phase (Phase II) would be constructed on the southern portion of the site generating 3 megawatts of power.

The District has reviewed the document and concurs with the proposed analysis of the air quality impacts associated with the intended project. The District also appreciates the focus on fugitive dust issues and that the proposed project must comply with the all requirements outlined in District Rule 403, *Fugitive Dust*, including submittal of a Dust Control Plan prior to initiating construction.

Maintain existing vegetation and minimize disturbed areas by keeping grading and ground disturbance to a minimum. Grading and ground disturbance should be limited to access roads, equipment pads, water tanks, and any retention basins. Mass site grading should not be used. The existing vegetation in all other areas of the site would be mowed to a maximum height of six inches.

Grading activities would be temporarily halted and/or site watering should be increased during wind speeds that exceed 25 miles per hour. Soil Binders and/or hydromulch should be applied if water is not sufficient to control the dust on site.

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A qualified construction mitigation manager (CMM) should be on-site during all grading activities to ensure compliance with the approved Dust Control Plan. The CMM should have authority to implement additional dust reduction measures if the situation warrants.

} 4

Thank you for the opportunity to review this planning document. If you have any questions regarding the information presented in this letter please contact me at (661) 723-8070 ext. 2 or bbanks@avagmd.ca.gov.

Sincerely,



Bret Banks
Operations Manager

2.3.1. Antelope Valley Air Quality Management District (AVAQMD – November), November 14, 2014

Response AVAQMD – November - 1

As described in Section 4.3.2 of the Draft IS-MND and MM AQ-1, the Project will comply with District Rule 403, *Fugitive Dust*.

Response AVAQMD – November - 2

As described in Section 4.3.2 of the Draft IS-MND and MM AQ-1, the Project will maintain existing vegetation and keep grading and ground disturbance to a minimum. Mass site grading will not be used.

Response AVAQMD – November - 3

As described in Section 4.3.2 of the Draft IS-MND and MM AQ-1, grading activities will be temporary halted when wind speeds exceed 25 miles per hour and soil binders and wood mulch will be applied if and as necessary.

Response AVAQMD – November - 4

As described in Section 4.3.2 of the Draft IS-MND and MM AQ-1, a qualified construction mitigation manager will be on-side during grading activities to ensure compliance with the approved dust control plan. The CMM will have authority to implement additional dust reduction measures if the situation warrants.



Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heaston, Executive Director

In reply please refer to AV1214/105

December 10, 2014

Los Angeles County
Department of Regional Planning
320 Temple Street
Los Angeles, CA 90012
Attn: Anthony Curzi

Project: Project # R2013-03397-(5), Conditional Use Permit # 201300170.

Dear Mr. Curzi:

The Antelope Valley Air Quality Management District (District) reviewed the Initial Study/Mitigated Negative Declaration for the proposed Antelope Valley Solar 7.45 megawatt ground mounted solar photovoltaic facility on a 72 acres site located at the southwest corner of East Avenue F and 90th Street East.

The District is concerned about the air quality impacts associated with the intended project. The proposed project must comply with the all requirements outlined in District Rule 403, *Fugitive Dust*, including submittal of a Dust Control Plan prior to initiating construction.

Grading and ground disturbance should be limited to access roads, equipment pads, water tanks, and any retention basins. Mass site grading should not be used. The existing vegetation in all other areas of the site should be mowed to a maximum height of six inches. If for safety reasons mowing cannot be performed soil binders and/or hydro-mulch should be applied if water is not sufficient to control the dust after the natural vegetation has been removed.

Grading activities would be temporarily halted and/or site watering should be increased when wind speeds exceed 25 miles per hour. A qualified construction mitigation manager (CMM) should be on-site during all grading activities to ensure compliance with the approved Dust Control Plan. The CMM should have authority to implement additional dust reduction measures if the situation warrants.

Thank you for the opportunity to review this planning document. If you have any questions regarding the information presented in this letter please contact me at (661) 723-8070 ext. 2 or bhanks@avaqmd.ca.gov.

Sincerely,

Bret Banks
Operations Manager



2.3.2. Antelope Valley Air Quality Management District (AVAQMD – December), December 10, 2014

Response AVAQMD – December - 1

As described in Section 4.3.2 of the Draft IS-MND and MM AQ-1, the Project will comply with District Rule 403, *Fugitive Dust*.

Response AVAQMD – December - 2

As described in Section 4.3.2 of the Draft IS-MND and MM AQ-1, the Project will maintain existing vegetation and keep grading and ground disturbance to a minimum. Mass site grading will not be used.

Response AVAQMD – December - 3

As described in Section 4.3.2 of the Draft IS-MND and MM AQ-1, grading activities will be temporary halted when wind speeds exceed 25 miles per hour and soil binders and wood mulch will be applied if and as necessary. A qualified construction mitigation manager will be on-side during grading activities to ensure compliance with the approved dust control plan. The CMM will have authority to implement additional dust reduction measures if the situation warrants.



Lahontan Regional Water Quality Control Board

December 17, 2014

File: Environmental File Review
Los Angeles County

Anthony Curzi
Department of Regional Planning
Zoning Permits North Section, Room 1348
320 West Temple Street
Los Angeles, CA 90012
Email: acurzi@planning.lacounty.gov

**COMMENTS ON THE INITIAL STUDY- MITIGATED NEGATIVE DECLARATION FOR
THE ANTELOPE VALLEY SOLAR RENEWABLE ENERGY PROJECT, LOS ANGELES
COUNTY, STATE CLEARINGHOUSE NO. 2014111022**

The California Regional Water Quality Control Board, Lahontan Region (Water Board) staff received the Initial Study/Mitigated Negative Declaration (IS-MND) for the above-referenced project (Project) on November 13, 2014. The County of Los Angeles (County), acting as lead agency, prepared and submitted the IS-MND in compliance with provisions of the California Environmental Quality Act (CEQA). Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations, title 14, section 15096. Based on our review of the IS-MND, we have determined that (1) Low-Impact Development (LID) construction practices should be included as part of the Project, (2) soil types should be included in the hydrology and erosion potential analysis, and (3) best management practices (BMPs) that effectively treat construction and post-construction stormwater run-off, should be included as part of the Project. We encourage the County to consider our comments and value our mission to protect waters of the State and maintain water quality in the Lahontan Region.

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Project Description

The Project is a photovoltaic (PV) solar-electricity generating facility located in eastern Antelope Valley. Specifically, the Project is located at the southwest corner of Avenue F and 90th Street East, in unincorporated Los Angeles County, approximately six miles northeast of the City of Lancaster. The Project area is previously disturbed agricultural land that was farmed before 1974 and will encompass an area of approximately 80 acres. The Project will be developed in two phases: the first phase will be built on the northern half of the site and generate approximately 4.45 megawatts (MW) of electricity; the second phase will be built on the southern half of the site and will generate approximately 3 MW of electricity. Both phases of the Project will interconnect to the Southern California Edison (SCE) distribution circuits located near the eastern boundary of the site.



Major Project components will include the following: a solar field of north-south rows of PV panels, mounted on fixed-tilt or single-axis tracking systems; electrical collection and inverter-transformer system that converts direct current into alternating current and increases the voltage to 12.47 kilovolts; circuits, meters, relays, circuit breakers, fuses, surge protectors, poles, and other interconnection equipment; meteorological data collection systems; and infrastructure including driveways, access roads, secure fencing, landscaping, retention basins, and water tanks for fire protection.

Authority

All groundwater and surface waters are considered waters of the State. Surface waters include streams, ponds, lakes, wetlands, and swales, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at http://www.waterboards.ca.gov/lahtontan/water_issues/programs/basin_plan/references.shtml.

Specific Comments

Our comments on the Project are outlined below.

1. In general, the installation of PV grid systems for these types of projects has the potential to hydrologically modify natural drainage systems. The Project site is located within the Antelope Hydrologic Unit 626.00, Lancaster Hydrologic Area 626.50, of the Lahontan Region. Beneficial uses of these minor surface waters are listed in Chapter 2 of the Basin Plan and include the following: municipal and domestic supply (MUN), agricultural supply (AGR), groundwater recharge (GWR), water contact recreation (REC-1), noncontact water recreation (REC-2), warm freshwater habitat (WARM), and wildlife habitat (WILD). An analysis of the potential impacts to water quality with respect to those beneficial uses must be included in the Project development process. We request that the Project proponent minimize new road construction and use construction practices that avoid or minimize impacts to water quality. Where feasible, at-grade road crossings are preferred over culverted crossings. We request that specific mitigation measures be identified, that, when implemented, will minimize unavoidable impacts to a less than significant level to ensure that no net loss of function and value will occur as a result of Project implementation.
2. We appreciate inclusion of the detailed study, "Hydrology, Water Quality, and Low Impact Development" (Appendix G), which included the stormwater runoff calculations for 50-, 25-, 10-, 5-, and 2-year return interval rain events and storage volume calculations. However, one detail lacking from the study is a description of

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the soil types present at the site, and a discussion of their erosion potential for the various storm events.

3. Land disturbing activities such as trenching, grading, and excavation have the potential to degrade water quality through increased soil erosion or sedimentation. In addition, compaction of soils in both construction and equipment staging areas can result in loss of soil infiltration and absorption capacities. We request the environmental document identify mitigation measures to capture site run-on to promote groundwater recharge and minimize erosion. In addition, we request additional discussion of the importance of minimizing grading activity as part of the LID plan for the purpose of protecting water quality, both during and after construction. Such discussion should include a description of site soil types, soil erosion potential, and engineered features including BMPs, swales, and catch basins, that will be installed.
4. We request that construction staging areas be sited in upland areas outside stream channels and away from any minor surface waters that may occur during the wet season on or around the Project site. Buffer areas should be identified and exclusion fencing used to protect the water resource and prevent unauthorized vehicles or equipment from entering or otherwise disturbing stream channels. Construction equipment should use existing roadways to the maximum extent feasible. All temporary impacts should be restored (re-contoured and re-vegetated) to match pre-Project conditions.
5. Post-construction stormwater management must be considered a significant Project component, and BMPs that effectively treat post-construction stormwater runoff should be included as part of the Project. Of particular concern are collection of onsite stormwater runoff and the concentrated discharge of that stormwater to natural drainage channels. Design alternatives that are compatible with LID should be considered. LID components include: maintaining natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge; managing runoff as close to the source as possible; and maintaining vegetated areas for stormwater management and onsite infiltration. Vegetation clearing should be kept to a minimum. Where feasible, existing vegetation should be mowed so that after construction, the vegetation could re-establish and help mitigate for potential stormwater impacts.
6. Obtaining a permit and conducting monitoring does not constitute adequate mitigation. Development and implementation of acceptable mitigation is required. The environmental document must specifically describe the best management practices and other measures used to mitigate Project impacts.

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Permitting Requirements

A number of activities associated with the proposed Project appear to have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include:

December 17, 2014

7. Land disturbances of more than 1 acre may require a Clean Water Act (CWA), section 402 (p) stormwater permit, including a National Pollution Discharge Elimination System (NPDES) General Construction Stormwater Permit, Order 2009-0009-DWQ (as amended), obtained from the State Water Board, or an individual stormwater permit obtained from the Lahontan Water Board;
8. Depending on the Standard Industrial Classification (SIC) code for industrial-type activities at the site, the Project may require an NPDES General Industrial Stormwater Permit, Order 97-03-DWQ, obtained from the State Water Board, or an individual stormwater permit obtained from the Lahontan Water Board; and
9. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.

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Please be advised of the permits that may be required for the proposed Project, as outlined above. We request that specific Project activities that may trigger these permitting actions be identified in the appropriate sections of the IS-MND. Should Project implementation result in activities that will trigger these permitting actions, the Project proponent must consult with Water Board staff. Information regarding these permits, including application forms, can be downloaded from our web site at <http://www.waterboards.ca.gov/lahtontan/>.

Thank you for the opportunity to comment on the IS-MND. If you have any questions regarding this letter, please contact me at (760) 241-7391 (tbrowne@waterboards.ca.gov) or Patrice Copeland, Senior Engineering Geologist, at (760) 241-7404 (pcopeland@waterboards.ca.gov).


Tom Browne, PhD, PE
Water Resources Control Engineer

cc: California Department of Fish and Wildlife, South Coast Region,
(askR5@wildlife.ca.gov)
State Clearinghouse (SCH 2014111022)
(state.clearinghouse@opr.ca.gov)

RB6\RB6Victorville\Units\Patrice Unit\Tom\CEQA Reviews\AV Solar Renewable Energy Project 90th St E Ave F\draft2 IS-MND antelope valley solar 90th St E and Ave F.docx

2.3.3. Lahontan Regional Water Quality Control Board (Water Board), December 17, 2014

Response Water Board – 1

The Draft IS-MND provides an extensive description of the Low-Impact Development construction practices, soil types for the Site, and best management practices (“BMPs”) that effectively treat construction and post-construction stormwater run-off.

Specifically, Section 4.10 of the Draft IS-MND provides a description of the Hydrology, Water Quality, and Low Impact Development Report prepared and attached to the Draft IS-MND as Appendix G (the “LID Report”). The LID Report identifies the Project potential pollutant sources and provide construction-related and post-construction BMPs to prevent Site runoff and mitigate any water quality impairment of the receiving water bodies. As the Project would not generate any pollutants of concern, impacts would be less than significant. A revised version of this LID Report, approved by the County Department of Public Works, is attached to this Final IS-MND as Appendix G.

As detailed in the LID Report, the Project will incorporate retention basins along the northern boundary of each Phase of the Project to ensure that any increase in surface runoff due to the Project would be maintained at pre-development levels. In accordance with the County LID requirements, the volume from a capital storm would be retained on retention basin(s) located on the northern boundary of each Phase of the Project. The Site and surrounding area is in Debris Production Area 11, which generates the lowest debris production rate in the County, 1300 cubic yards per square mile. For the 80-acre project this equates to about 165 cubic yards (4,455 cubic feet). On a sheet flow basis, this is less than 0.002 feet (1/64 inch) over the entire Site and is insignificant.

Section 4.7.1 of the Draft IS-MND summarizes the soil types that may be found on the Site, a detailed description of which may be found in the Geotechnical Engineering Report, attached to the Draft IS-MND as Appendix E. (Per the County’s request, the Geotechnical Engineering Report was not attached to the LID Report.) As noted in Section 4.7.1, the soils encountered in the exploratory borings on the Site are alluvial deposits, consisting of interbedded layers of silty sands, clayey sands, relatively clean sands, sandy silts and sandy and silty clays (SM, SC, SP, ML and CL soil types based upon the Unified Soil Classification System). Some of the upper two to three feet of the native site soils were found to be relatively loose/soft, non-uniform, and of low relative compaction. The underlying coarse-grained soils (SM and SP soil types) encountered below a depth of approximately three feet were found to be medium dense to dense. The underlying fine-grained soils (ML and CL soil types) encountered below a depth of approximately three feet were found to be medium stiff to stiff. Based upon the consolidation test results, some of the native Site soils within the top two to three feet are anticipated to demonstrate a slight to moderate tendency to hydrocompress (experience a loss in volume upon wetting, with or without additional loading; commonly referred to as “collapsing soil”). The soils tested below a depth of approximately three feet, through the depths tested, were found to demonstrate a negligible to slight tendency to hydrocompress. Free groundwater or perched water was not encountered in the borings at the time of drilling. Static aquifer groundwater levels in the vicinity of the Site are estimated to be deeper than 50 feet below the existing surface.

Response Water Board – 2

As requested, the Project has minimized new road construction to the maximum extent possible. The only roads that will be constructed on the Project will be service roads required by the County Fire

Department for fire access purposes. Additionally, the only paved roads required on the Project will be the entranceways to each Phase of the Project, again as required by the County Fire Department. Additionally, the Project does not expect to construct any road crossings, including culverted crossings.

Response Water Board – 3

A detailed analysis of the soil types present on the Site is provided in the Geotechnical Engineering Report attached to the Draft IS-MND as Appendix E. The County requested that the Geotechnical Engineering Report not be attached to the LID Report.

Response Water Board – 4

Several portions of the Draft IS-MND described the extent (and limits) to the grading activities that will occur during the construction of the Project. For instance, Section 3.5 of the Draft IS-MND provides, in part, that: grading and ground disturbance for the Project would be minimal and primarily limited to access roads, equipment pads (including inverter-transformer pads and Project switchgear), water tanks, and retention basins. Mass site grading will not be utilized. The solar arrays would be installed using pile-driving techniques, rather than grading, to minimize soil disturbance. Any undulations in the terrain would be accounted for by varying the mounting height of the PV panels. This reduced grading will help maintain existing hydrologic features and patterns on the Site. Therefore, other than the irrigation basins installed on the northern boundaries of each Phase of the Project (as described in the LID Report) designed to capture site run-off, promote groundwater recharge, and minimize erosion, the Site will be largely ungraded (facilitating the growth of vegetation) with the natural contours of the Site remaining undisturbed.

Response Water Board – 5

As described in Section 3.2 of the Draft IS-MND, there are no wetlands, streams, streambeds, or other bodies of water on or near the Site. The topography of the Site is flat with no major distinguishing features. There is an approximately 10-foot change in elevation (0.34 percent slope) from the southeast to the northwest corner of the Site. During construction, staging areas will be located outside of stream channels and away from minor surface waters that may occur during the wet season. Additionally, construction vehicles will use existing roadways to access the Site (from East Avenue F or East Avenue F-8), and Project will minimize the number of new roads constructed on the Site.

Response Water Board – 6

The LID Report provides a detailed description and analysis of the BMPs undertaken by the Project to effectively treat post-construction stormwater runoff. The inclusion of irrigation basins for each Phase of the Project, together with the minimum grading that will occur on the Site, work to maintain natural drainage paths and landscape features to slow and filter runoff and maximize groundwater recharge, manage runoff on the Site, and maintain vegetated areas for onsite filtration. On-Site vegetation will be mowed during the operations period as required by the County Fire Department.

Response Water Board – 7

See responses set forth above.

Response Water Board – 8

As discussed in Section 4.7.2 of the Draft IS-MND, implementation of the Project has the potential to generate storm water pollutants during the construction phase. Storm water runoff from the Project site

could contain pollutants such as soils and sediments that are released during grading and excavation activities, as well as chemical and petroleum-related pollutants due to spills or leaks from heavy equipment and machinery. The potential impacts of soil erosion on the Site would be minimized through a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. The SWPPP would prescribe temporary Best Management Practices (BMPs) to control wind and water erosion during and shortly after construction of the Project. This permit is required for construction activities, including demolition, clearing, grading, and excavation, and other land disturbance activities that result in the disturbance of one acre or more of total land area.

Response Water Board – 9

The Project is categorized as SIC Code 4931 (NAICS Code 221111). SIC Code 4931 is not on the current list of regulated standard industrial codes which would be subject to the General Industrial Stormwater Permit.

Response Water Board – 10

As described in the Draft IS-MND, there are no wetlands, streams, streambeds, or other bodies of water on or near the Site.

2.4 ORGANIZATIONS

- County Sanitation Districts of Los Angeles County, December 11, 2014
- Roosevelt Town Council (Town Council), December 16, 2014



COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

GRACE ROBINSON HYDE
Chief Engineer and General Manager

December 11, 2014

Anthony Curzi
Los Angeles County
Department of Regional Planning
Zoning Permits North Section, Room 1348
320 W. Temple St.
Los Angeles, CA 90012

Dear Mr. Curzi:

Comment Letter – Initial Study/Mitigated Negative Declaration for the Antelope Valley Solar Energy Project

The County Sanitation Districts of Los Angeles County (Sanitation Districts) appreciate this opportunity to submit comments on the Los Angeles County Department of Regional Planning's "Initial Study/Mitigated Negative Declaration Antelope Valley Solar Energy Project Unincorporated Los Angeles County, California (Project No. R2013-03397-(5), CUP No. 201300170, Environmental Assessment No. 201300290)." The Sanitation Districts are a confederation of special districts, which operate and maintain regional wastewater and solid waste management systems for approximately 5.5 million people who reside in 78 cities and unincorporated areas in Los Angeles County. The Sanitation Districts operate 11 wastewater treatment plants, two of which are located in the Antelope Valley and produce recycled water that may be used for aspects of the proposed project. As such, the Sanitation Districts has the following comments.

Sanitation Districts' Land is not Used to Store Treated Sewage Water

Sections 3.3, 4.1.1, 4.13.1, and the Environmental Checklist Item 9 all contain language stating "With the exception of the Site, and a few parcels located immediately west of the Site, all of the land north, south, and west of the Site between Avenues D and G and 70th and 90th Streets East (approximately six square miles) is owned by the Los Angeles County Sanitation District (LACSD). LACSD uses this land as an offsite storage location for its treated sewage water via crop circle alfalfa farming." While recycled water is used for farming, the land is not used as an offsite storage location for treated sewage water. Therefore, we propose the language in all parts of the document be modified in the following manner:

"With the exception of the Site, and a few parcels located immediately west of the Site, all of the land north, south, and west of the Site between Avenues D and G and 70th and 90th Streets East (approximately six square miles) is owned by the Los Angeles County Sanitation District (LACSD). LACSD uses this land as an offsite storage location for its treated sewage water via for crop circle alfalfa farming irrigated with recycled water."

DOC # 3168504

Recycled Paper 

"LACSD" Should be Used as the Acronym for Only One Agency throughout the Document
In order to avoid confusion and provide the most clarity, the LACSD acronym should only be used as the abbreviation for one agency. Currently, LACSD is used throughout the document for our agency and in Sections 4.15.1 and 4.15.2 for the Los Angeles County Sheriff's Department.

} 2

The Sanitation Districts thank you in advance for your consideration of these comments. If you have any questions concerning this letter, please feel free to contact the undersigned at (562) 908-4288, extension 2707.

Very truly yours,

Grace Robinson Hyde



Jodie Lanza
Civil Engineer
Planning Section

JL:rvr

2.4.1. County Sanitation Districts of Los Angeles County (“LACSD”), December 11, 2014

Response LACSD - 1

These comments are addressed in Section 4.0 of this Final IS-MND by amendment to the sections referenced in the LACSD letter.

Response LACSD - 2

These comments are addressed in Section 4.0 of this Final IS-MND by amendment to the sections referenced in the LACSD letter.

From: Myrle McLemon [mailto:mdmarchitects@yahoo.com]
Sent: Tuesday, December 16, 2014 8:12 AM
To: david@revelt.com
Cc: Barbara Firsick; Ron Ferrell; Norm Hickling
Subject: Solar Project on Avenue F, Town Council response

David;

Thank you for the presentation and information at the hearing last week.

As noted at the hearing, the council was not aware of the project until November. Unfortunately this creates a time issue in the decision process.

The Roosevelt Town council has discussed a few significant mitigation measures brought up at the meeting.

If these can be done, the January hearing will not be contested by the council.

1. Screen the chain link fence and plant native plants such as Sage, Mormon tea, etc in the Landscape buffer.

This will eliminate the costly maintenance of trees and let the desert establish itself as a buffer. The visual gaps between and over the foliage will be screened.

This is no different than any neighbor screening their yard

} 1

2. Construct the 2nd Phase first.

This removes the immediate effect on the resident directly adjacent to Phase 1.

Per the discussion, it was mentioned phase 2 will be a stand alone connection to Edison so it would require

an additional point of connection regardless of order of construction.

} 2

3. Place a permanent sign at the entrance to the project in plain site containing the following:

A statement reading:

"To report a buildup of debris, overgrown foliage, or apparent damage to this facility,

Call the following numbers:"

(Contact number for project management)

(Backup number in case first number does not work)

(Number of Zoning Enforcement, LA County in case there is no response to the first 2 numbers)

} 3

Exact wording can be determined at a later date. The idea is to make an immediate contact number available

in case of any issues observed, allowing the project ownership to take direct action prior to involving the county.

We believe this project can be done in our area with minimal effect. The above items are the only significant issues we were concerned with.

If any of these are not possible, we would schedule a Town Council meeting the latter part of January to work out what can be done. This would allow a February approval of the project by the planning commission.

Thank You
Myrle McLernon
Member
Roosevelt Town Council



"We create the spaces where you live, work, and play."

Myrle D. McLernon AIA

2000 W. 10th Avenue

Denver, CO 80202

303.733.1000

<http://www.mdmarchitects.net>

2.4.2. Roosevelt Town Council (Town Council), December 16, 2014

Following receipt of this comment letter, Applicant and County staff had further discussions with Mr. McLernon, who represented the Roosevelt Town Council, to clarify his concerns. The responses below incorporate the result of these discussions.

Response Town Council - 1

The Project will contain landscaping or screening pursuant to a Landscape/Screening Plan to be prepared by the Applicant and approved by the County. Any landscaping will be drought-tolerant and native or non-native, as approved by the County. Additionally, any screening will be suitable to withstand expected weather and elements near the Site. See Section 2.1.2 (above) of this Final IS-MND for a further discussion of aesthetic impacts of the Project and the modification of MM AES-1 to address this comment and accommodate this concern.

Response Town Council - 2

The Project is divided in two Phases, with Phase 1 being located on the northern portion of the Site, and Phase 2 (if it goes forward) expected to be located on the southern portion of the Site. While for purposes of evaluating the Project under CEQA, Applicant has assumed that both Phases of the Project will be constructed, Phase 2 of the Project is unlikely to be constructed until at least late 2016 or 2017. The location of the Phase 1 of the Project cannot be changed. The location for Phase 1 of the Project was established under the power purchase agreement and interconnection agreement for the Project entered into with Southern California Edison ("SCE"). Once established, SCE does not permit solar projects to move locations. After further discussions, Mr. McLernon understood this constraint and withdrew this request.

Response Town Council - 3

Applicant has agreed to install signs on the Project (including providing contact information for representatives of the Project) in accordance with the County requirements.

SECTION 3.0 MITIGATION MONITORING AND REPORTING PROGRAM

Section 21081.6 of CEQA and Section 15097 of the State CEQA Guidelines require a public agency to adopt a Mitigation Monitoring and Reporting Program (“MMRP”) for assessing and ensuring the implementation of required mitigation measures applied to proposed Projects. Specific reporting and/or monitoring requirements that will be enforced during project implementation shall be adopted simultaneously with final Project approval by the responsible decision-making body.

The final MMRP for the Project is attached hereto as Appendix A, and replaces the draft MMRP attached to the Appendix A of the Draft IS-MND.

The final MMRP for the Project consists of Mitigation Measures that will reduce or avoid significant environmental effects associated with Project implementation and reflects any changes to mitigation measures presented in Section 4.0, Errata, of this Final MND.

SECTION 4.0 ERRATA

The following text changes are made to the Draft IS-MND and incorporated as part of the Final IS-MND. These changes further substantiate conclusions and/or clarify aspects of the previously circulated document. None of these changes reflect a determination of a new or more significant environmental impact than disclosed in the Draft IS-MND. Changes to the text are noted in **bold** (for added text) or ~~strikeout-type~~ (for deleted text).

Sections 3.3, 4.1.1, and 4.13.1

With the exception of the Site, and a few parcels located immediately west of the Site, all of the land north, south, and west of the Site between Avenues D and G and 70th and 90th Streets East (approximately six square miles) is owned by the Los Angeles County Sanitation District (“**LACSD**”). LACSD uses this land ~~as an offsite storage location for its treated sewage water via~~ for crop circle alfalfa farming irrigated with recycled water.

Exhibit 3-4, Site Plan and Details

Exhibit 3-4, Site Plan and Details, in the Draft IS-MND is replaced with Exhibit 3-4, Site Plan and Details attached to this Final IS-MND (the “**Revised Site Plan**”). The revisions set forth in the Revised Site Plan do not reflect new or more significant environmental impact than disclosed in the Draft IS-MND. Instead, the Site Plan was revised to be consistent with the Revised Hydro Report (described below). The Revised Site Plan has been approved by the County.

Table 3-2, Grading Quantities

Table 3-2, Grading Quantities, in the Draft IS-MND is replaced with the Table 3-2 below. The revisions to the grading table do not reflect new or more significant environmental impact than disclosed in the Draft IS-MND. Instead, the total grading for the infiltration basin was increased to be consistent with the Revised Hydro Report (described below). The revised grading table has been approved by the County.

Table 3-2 GRADING QUANTITIES								
	Phase 1				Phase 2			
Project Component	Cut Materials (CY)	Fill Materials (CY)	Net Change (CY)	Disturbed Area (Acres)	Cut Materials (CY)	Fill Materials (CY)	Net Change (CY)	Disturbed Area (Acres)
Access Roads	6000	6900	-900	3.5	5000	5800	-800	3.0
Structure Pads	400	500	-100	0.4	400	600	-200	0.4
Water Tanks	0	200	-200	0.01	0	200	-200	0.01
Infiltration Basin	1200	0	1200	0.5	1200	0	1200	0.5
Totals:	7600	7600	0	4.4	6600	6600	0	3.9

Section 4.11.1, Land Use Planning, Environmental Setting

Modification of Fence Height.

As described in Sections 1.1 and 4.11 of the Draft IS-MND, the Site is zoned "Heavy Agriculture" (A-2-1). Pursuant to Section 22.24.170 of the County Zoning Code, front, side, and rear yards for property zoned A-2-1 shall be provided as required for Zone R-1. Pursuant to Section 22.20.120 of the County Zoning Code, property zoned R-1 shall have (a) a front yard of at least 20 feet in depth, (b) side yards of at least 5 feet, and (c) rear yards of at least 15 feet. A twenty foot (20') access road surrounds the perimeter of each phase of the Project inside of the perimeter fencing, and thus, solar equipment for each Phase of the Project will be at least twenty feet (20') from the perimeter border of Site.

As described in Section 3.4 of the Draft IS-MND, each Phase of the Project will be secured by a six-foot-high chain-link fencing with an additional one to two feet of three-strand barbed wire. The fencing required to enclose Phase 1 of the Project will be accomplished with Phase 1 of the Project, and the fencing required to enclose Phase 2 of the Project will be accomplished with Phase 2 of the Project.

Pursuant to Section 22.48.160 of the County Zoning Code, fences erected (a) in front yards may not exceed 3.5 feet in height, (b) in side yards may not exceed 5 or 6 feet in height, and (c) fences in the rear yard may not exceed 6 feet in height. Accordingly, in addition to and as part of the CUP, a modification to the fence height is required for the Project to permit the fencing for each Phase of the Project to be six-foot-high chain-link fencing with an additional one to two feet of three-strand barbed wire.

Section 4.11.2(c), Would the project be inconsistent with the County zoning ordinance as applicable to the subject property?

No Impact. As mentioned above, electric generating plants are a conditionally permitted use in the Heavy Agricultural (A-2) zone upon obtaining a CUP. By obtaining a CUP for the Site, a solar PV facility is a permitted use consistent with County zoning ordinances applicable to the Site, consistent with the County zoning ordinance. **By obtaining the modification to the fence height, six-foot-high chain-link fencing with an additional one to two feet of three-strand barbed wire may be constructed on the Site for each Phase of the Project. Therefore, no impact will occur.**

Section 14.15.1

The nearest County fire station to the Site is Fire Station 117, located at 44851 30th Street East, Lancaster, CA 93535, which is approximately 7 miles west of the Site. Police protection services for the Site are provided by the Los Angeles County Sheriff's Department (~~"LACSD"~~) located at 501 West Lancaster Boulevard, Lancaster, CA 93534.

Section 14.15.2(ii) (second paragraph)

Operation of the Project is largely unmanned and would require limited ~~LACSD~~ **Los Angeles County Sheriff's Department** protection services. The proposed solar facilities would be surrounded by a six-foot-tall fence with an additional one to two feet of three-string barbed wire to prevent unauthorized access or trespassing. Perimeter, motion-activated fence lighting may be installed to provide nighttime security of the solar facility. Patrol services around the solar facilities are expected to continue to be

provided by the ~~LACSD~~ **Los Angeles County Sheriff's Department** personnel. Therefore, construction and operations of the Project would have a less than significant impact on sheriff protection services and their staffing or response times.

Appendix G, Hydrology Water Quality, and Low Impact Development Reports

The Hydrology, Water Quality, and Low Impact Development Reports attached to the Draft IS-MND as Appendix G is deleted in its entirety and replaced with Appendix G, attached to this Final IS-MND (the "Revised Hydro Report").

The revisions set forth in the Revised Hydro Report do not reflect new or more significant environmental impact than disclosed in the Draft IS-MND. Instead, the Revised Hydro Report moves and widens the retention basin required for each Phase of the Project from the western boundary of the Project to the northern boundary of each Phase of the Project. Additionally, the Revised Hydro Report includes additional data and formatting requested by the County Department of Public Works. The Revised Hydro Report has been approved by the County.



COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS
LAND DEVELOPMENT DIVISION
HYDROLOGY UNIT

TO: DJP Engineering, Inc.
100 North Barranca Suite 860
West Covina, CA 91791

Date: 11/19/2014

REVIEW OF HYDROLOGY STUDY

PD/MTD. NO. NA
CUP NO. 201300170
TRANS DATE: 11/03/2014

CITY OF NA
THOMAS GUIDE 3927
PLAN CHECK NO. 3


We have reviewed your Hydrology Study.

☒ The Hydrology Study has been approved.

☐ Refer to comments below:

COMMENTS:

REVIEWED BY


Andrew Ross (626) 458-4921



APPROVED BY:



HYDROLOGY, WATER QUALITY, AND LOW IMPACT DEVELOPMENT REPORT

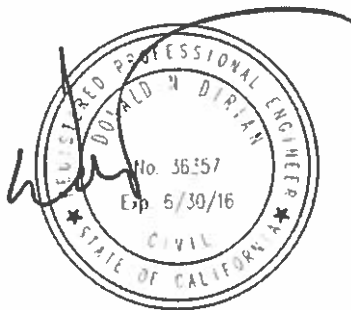
Antelope Valley Solar
Assessor's Parcels 3307-016-012 & 3307-016-013
Lancaster, California

PREPARED FOR:

Antelope Valley Solar, LLC
837 9th Street, Suite D
Santa Monica, CA 90403

PREPARED BY:

DJP Engineering, Inc.
100 North Barranca
Suite 860
West Covina, CA 91791
(626) 966-8200



(October 2014)



HYDROLOGY STUDY APPROVED	
CHECKED BY: 	RCE NO. 76882 DATE 11/19/2014
APPROVED BY: 	DATE 11/19/2014
COUNTY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS LAND DEVELOPMENT DIVISION	

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Purpose

The purpose of this hydrology study ("study") is to determine the 50-year, 25-year, 10-year, 5-year, and 2-year, and water quality storm runoff emanating from on-site and off-site drainage areas, respectively, for the proposed Antelope Valley Solar Energy Project. The study will compare the existing and proposed conditions to determine the increase in peak storm flows and volumes due to the proposed grading and site improvements.

This study is based on Los Angeles County Department of Public Works Rational Method Hydrology procedures for a 50-year reoccurrence interval storm. The topographic survey prepared for the development, Alpine Butte USGS 7.5 minute Quadrangle, and FEMA Flood Insurance Rate Map (FIRM Panel 0475F) will serve as references for the study.

Project & Site Description

Antelope Valley Solar, LLC ("Applicant") proposes to develop a 7.45 MWac solar photovoltaic ("PV") project (the proposed "Project") in two phases on approximately 72 (net) acres of land in north Los Angeles County (the "Site"). The Project will be developed in two (2) phases. The first phase ("Phase 1") will be located on the northerly 38 acres of the Site, and the second phase ("Phase 2") will be constructed on the southerly portion of the Site. (See Appendix A.)

The Site is located at the southwest corner of Avenue F and 90th Street East, in unincorporated Los Angeles County, approximately six (6) miles northeast of the City of Lancaster. The Site consists of two contiguous parcels identified by County Assessor Parcel Numbers: 3307-016-012 and 3307-016-013, each of which is approximately thirty-eight (38) acres in size. The Site is bounded on the east by 90th Street East, on the north by Avenue F, on the south by Avenue F-8, and on the west by 87th Street East. 90th Street East and Avenue F are paved County roads, Avenue F-8 is an unpaved (dirt) County road, and 87th Street East is an unpaved and unimproved dirt trail not suitable for vehicle traffic. The Site is approximately 81 acres in gross area, and approximately 72 acres in net area after offers of dedication for roadways and slope easements are made to the County on all four boundaries of the Site.

Due to the predominantly flat nature of the Site, the Project will involve minimal grading for construction of inverter/transformer pads, water tanks, and scarification and recompaction of the interior fire/access roads at existing grade. These fire/access roads will not be paved and no changes in drainage patterns or concentration of flows is proposed. The post-development runoff will continue to sheet flow in the pre-development condition in order to avoid disturbance to downstream drainage structures and wildlife. During construction, existing vegetation may be cleared (or mowed), but vegetation will return following construction.

Drainage Overview

The topography of the Site is flat with no major distinguishing features. Onsite vegetation consists mostly of sparse, low-growing, desert scrub. There are no trees of any kind on the Site, and there are no streambeds or other aquatic resources identified on the Site.

A review of the topographic information, including an aerial topographic map, of the Site found that storm runoff generally sheet flows in an north-northwest direction at an approximate gradient of 0.4%. Flow does not concentrate anywhere on the Site in any large naturally formed channels.

Based on tributary drainage areas identified in the Alpine Butte USGS 7.5 minute Quadrangle, the tributary area south of the Site (consisting of approximately 60 acres) will continue to pass through the Project via sheet flow during extreme storm events with no increase in rate or volume. If the property south of the Site is developed or Avenue F-8 improved the run-on will be substantially reduced or eliminated. (See Appendix B.)

The eastern border and southeast portions of the Site, as well as the areas east of 90th Street East, are within FEMA Zone A. However, due to the elevated cross section of 90th Street East, some of the easterly watershed runoff does not reach the Site, see photo below. The remainder of the Site is Flood Zone X. (See Appendix C.)

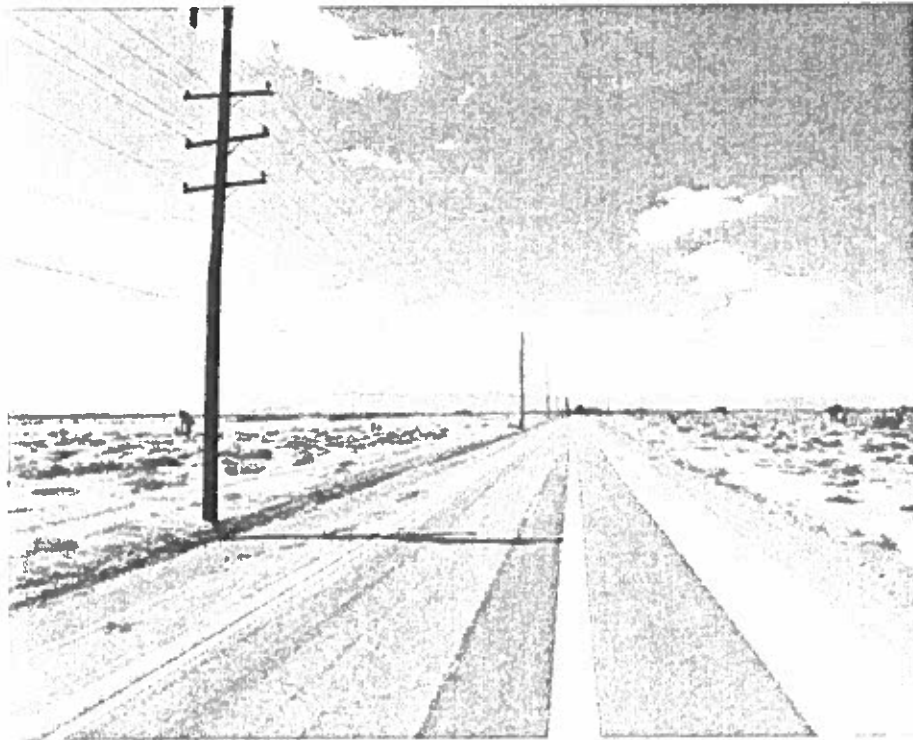


Figure 1: 90th Street East, South of Avenue F-8 (looking Southerly)

There are no signs of erosion due to the presence of vegetation and soils with high infiltration rates. Earth Systems prepared a Geotechnical Engineering Report for the Site and found that the soils on the Site consist of silty and clayey sands. The percolation test performed shows general soil infiltration rates of 1.3 inches per hour before any factor of safety is applied.

Methodology

Hydrologic calculations in this study were performed in conformance with the Los Angeles County Hydrology Manual, dated January 2006, utilizing the Modified Rational Method TC Calculator. The Modified Rational Method equation relates rainfall intensity, time of concentration, runoff coefficient, and drainage area size to the direct runoff from each drainage sub-area. Soil types, rainfall data and runoff coefficients were obtained from the LACDPW Hydrology Manual. Volumetric runoff differentials were calculated for each of the 38-acre pre- and post-development Phase 1 and Phase 2 of the Project based on the County's capital storm criteria. The construction of the solar panel arrays and other miscellaneous Site development will be accounted for by increasing the Site's impervious percentage from an existing condition of 1% to a post construction condition of approximately 12%. The 12% impervious ratio was calculated based on the county assumption of the solar fields accounting with an impervious percentage of 10%. The unpaved interior access roads were assumed to be 80% impervious and the equipment pads 100% impervious.

Conclusions & Recommendations

Due to the flatness of the existing and proposed terrain, and given the low rainfall intensities for this area, the default 30 minute maximum time-of-concentration for the watershed governs. The input parameters and output results for various storm frequencies can be found in Appendix C.

For each of the two (2) 38-acre Phases of the Project, the calculated on-site peak runoff rate for a capital storm is about 5.2 cubic feet per second (cfs). Based on an impervious percentage of 12%, this storm produces a 24-hour runoff volume of approximately 1.6 acre-feet (70,000 cubic feet / phase). By comparison, the undeveloped peak flow runoff rate was calculated to be 3.0 cfs / phase producing a 24-hour runoff volume of 38,500 cubic feet / phase. Thus, the largest differential in runoff volume between the pre- and post-development conditions on the Site is 31,368 cubic feet.

The additional runoff generated by the Project will be collected onsite with the help of twelve-foot (12') wide infiltration basins along the northerly boundary of each Phase of the Project. The basins will also provide water quality control due to their ability to intercept flows prior to leaving the site. Combined with the infiltration into the Site, these infiltration basins will ensure that the flow rate, volume, velocity, and depth corresponding to a capital storm at the Site boundary does not exceed the pre-development values.

The Site and surrounding area is in Debris Production Area 11, which generates the lowest debris production rate in the county, 1300 cubic yards per square mile. For the 80 acre project this equates to about 165 cubic yards (4,455 cubic feet). On a sheet flow basis, this is less than 0.002 feet (1/64 inch) over the entire Site and is insignificant.

HYDROLOGIC ANALYSIS

34° 45' 00"

REDMAN 1-HI.79

-118° 00' 00"

SITE

TRIB.
AREA 2

124

134

120

120

DPA-11

134

LANCASTER EAST 1-HI.68

HI VISTA 1-HI.70

120

120

124

123

DPA-9

DPA-9

DPA-9

DPA-9

123

ALPINE BUTTE

LITTLE ROCK 1-HI.59

34° 37' 30"

-117° 52' 30"



016

7.2

DPA - 6

SOIL
CLASSIFICATION
AREA

LAND USE
IN STUDY

DEVELOPMENT
POTENTIAL
AREA

1 0 1 2 Miles

25-YEAR 24-HOUR ISOHYET REDUCTION FACTOR: 0.878
10-YEAR 24-HOUR ISOHYET REDUCTION FACTOR: 0.714

**ALPINE BUTTE
50-YEAR 24-HOUR ISOHYET**

1-HI.69



Los Angeles County Department of Public Works

RUNOFF COEFFICIENT CURVE

SOIL TYPE NO. 120

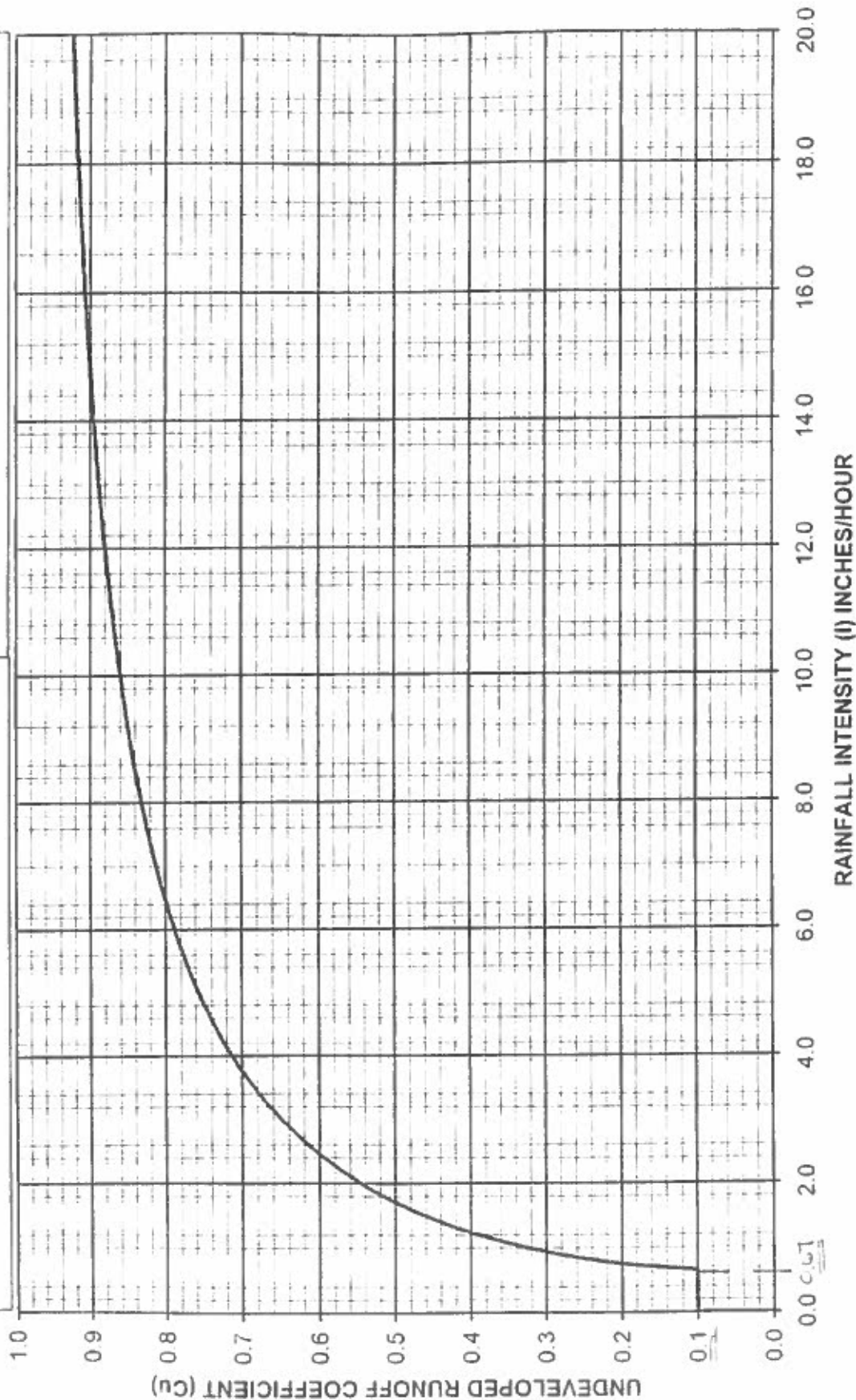


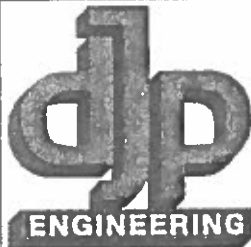
$C_D = (0.9 \cdot IMP) + (1.0 \cdot IMP) \cdot C_U$

Where: C_D = Developed Runoff Coefficient

IMP = Proportion Impervious

C_U = Undeveloped runoff coefficient





DJP ENGINEERING, INC
100 NORTH BARRANCA
SUITE 260
WEST COVINA, CA 91791
PHONE: (626) 966-8200
FAX: (626) 966-8255

WWW.DJPENGINEERING.COM

PROJECT: A/S.

PROJECT NO.: 14003

BY: D.W.D.

DATE: 10/20/14

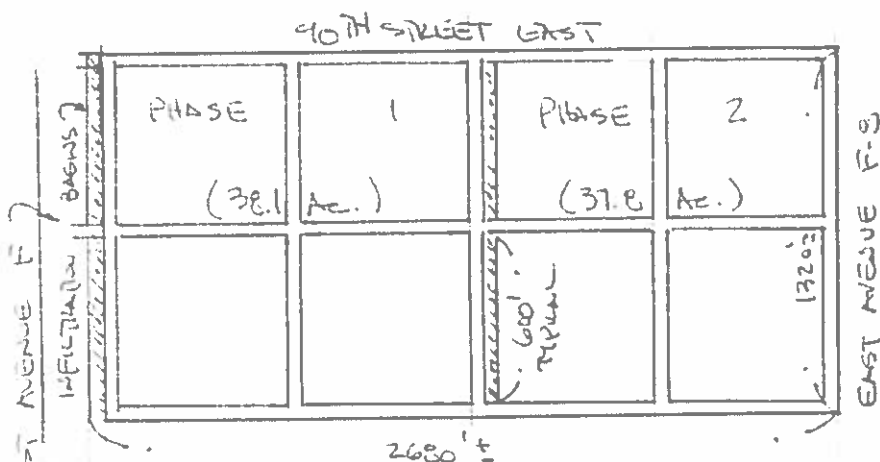
BY:

DATE:

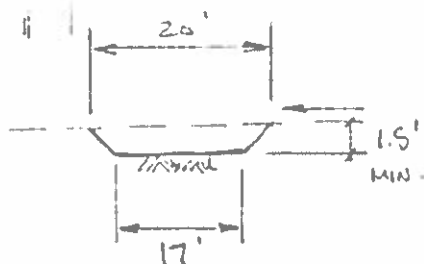
SHEET _____ OF _____

A.V.S. INFILTRATION BASIN REQUIREMENTS

Flow across 90th Street East
prevented by ROWWAY EMBANK-
MENT AND IMPROVEMENT FOR FLOW
DEPTHS LESS THAN 1'-2'.



TRD. OFF SIDE
 $Q_{50} = 4.94 \text{ cfs}$
(61 Ac.)



STORAGE VOLUME PROVIDED FOR PHASE

$$\text{VOLUME} = (17' \times 1.5' + 1.5^2) \times 600' \times 2 = 33,300 \text{ FT}^3$$

$$\text{TOTAL VOL. PROVIDED} = 2 \times 33,300 \text{ FT}^3 = 66,600 \text{ FT}^3$$

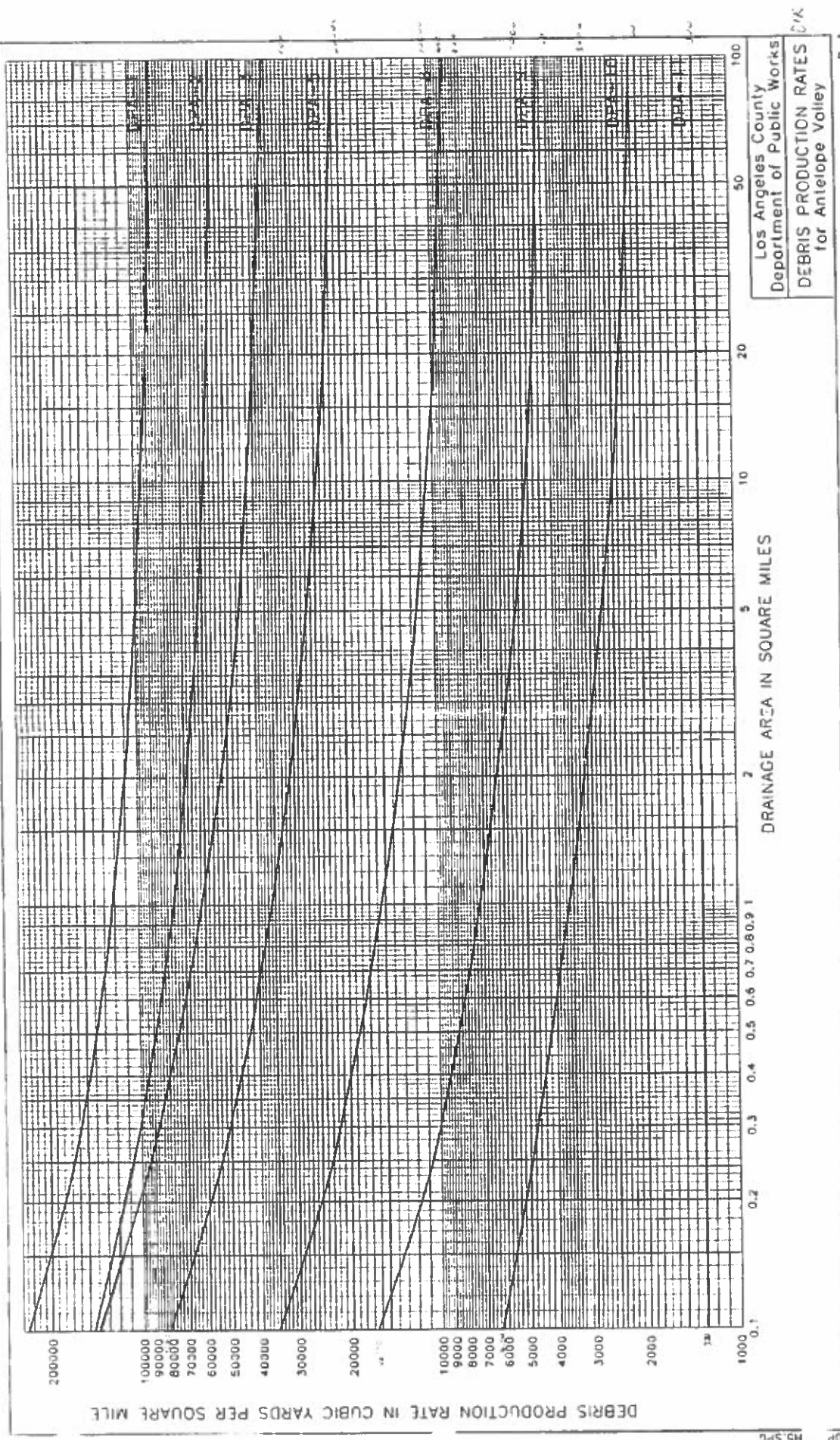
INFILTRATION PHASE 1

TYPICAL SECTION A.T.S.

$$\text{STORAGE VOLUME REQUIRED PHASE 1 (ST-12)} = 31368 \text{ FT}^3 < 33300 \text{ FT}^3 \therefore \text{O.K.}$$

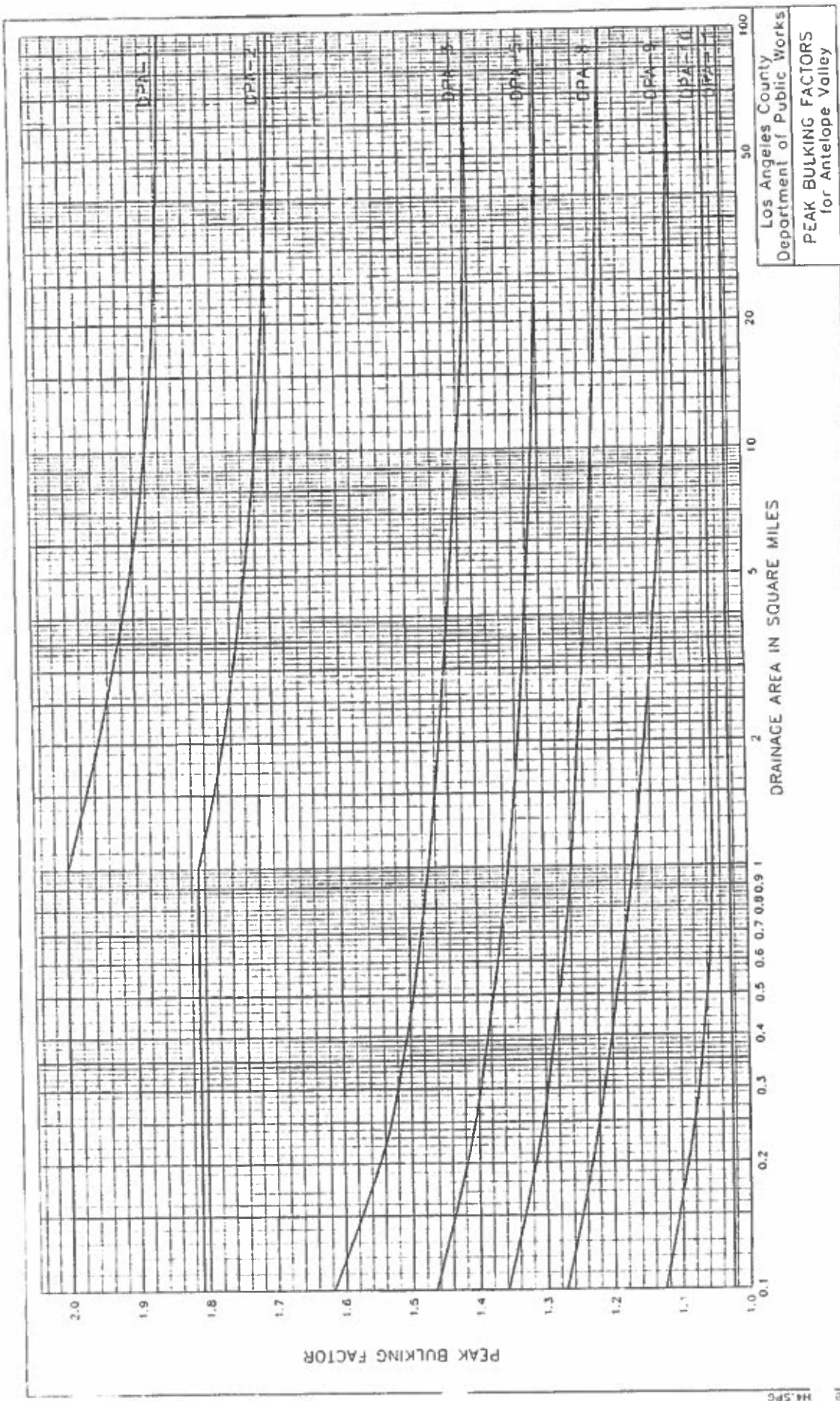
$$\text{STORAGE VOLUME REQUIRED PHASE 2 (ST-12)} = 31121 \text{ FT}^3 < 33300 \text{ FT}^3 \therefore \text{O.K.}$$

$$\begin{aligned} \text{WATER QUALITY VOLUME REQUIRED (ESTIM %)} &= 9409 \text{ FT}^3 \text{ PHASE 1} \\ &= 9335 \text{ FT}^3 \text{ PHASE 2} \\ &= 18744 \text{ FT}^3 \end{aligned}$$



Los Angeles County
Department of Public Works
DEBRIS PRODUCTION RATES
for Antelope Valley

P-3



HYDROLOGIC ANALYSIS

TABLE 1: HYDROLOGY DESIGN DATA

HYDROLOGY DESIGN DATA:	
RAINFALL DEPTH (50-YEAR)	2.6
SOIL TYPE	120
DPA ZONE	11
BURN FACTOR	0.34
BULKING FACTOR	1.02
PERCENT IMPERVIOUSNESS (PRE-DEVELOPMENT)	1%
PERCENT IMPERVIOUSNESS (POST DEVELOPMENT)	12%
AVERAGE SLOPE	0.004

TABLE 2: PHASE 1

DESIGN STORM FREQUENCY	AREA (ACRE)	PRE- DEVELOPMENT PEAK FLOW (CFS)	24-HOUR RUNOFF VOLUME (FT ³)	POST DEVELOPMENT PEAK FLOW RATE (CFS)	24-HOUR RUNOFF VOLUME (FT ³)	ΔVOLUME (ft ³)
2-YEAR	38.1	1.1	14905	1.9	27050	12145
5-YEAR	38.1	1.6	22493	2.9	40820	18327
10-YEAR	38.1	2.0	27500	3.6	49907	22407
25-YEAR	38.1	2.4	33816	4.4	61370	27554
50-YEAR	38.1	3.0	38644	5.3	70012	31368
3/4" STORM	38.1	-	-	1.4	20163	20163
85th %	38.1	-	-	0.7	9409	9409

TABLE 3: PHASE 2

DESIGN STORM FREQUENCY	NET AREA (ACRE)	PRE- DEVELOPMENT PEAK FLOW (CFS)	24-HOUR RUNOFF VOLUME (FT ³)	POST DEVELOPMENT PEAK FLOW RATE (CFS)	24-HOUR RUNOFF VOLUME (FT ³)	ΔVOLUME (ft ³)
2-YEAR	37.8	1.1	14788	1.9	26837	12049
5-YEAR	37.8	1.6	22316	2.9	40499	18183
10-YEAR	37.8	1.9	27283	3.5	49514	22231
25-YEAR	37.8	2.4	33550	4.3	60887	27337
50-YEAR	37.8	3.0	38340	5.2	69461	31121
3/4" STORM	37.8	-	-	1.4	20004	20004
85th %	37.8	-	-	0.7	9335	9335

Table 4: Phase 1 Detail Analysis

PRE DEVELOPMENT HYDROLOGY															
Subarea	Area (acres)	% IMP	Frequency	Soil Type	Length (ft)	Slope (ft/ft)	Isohyet (in)	Tc Calculated (min)	Intensity (in/hr)	Cu	Cd	Fire Factor	Flow Rate (cfs)	Burned Flow Rate (cfs)	Volume (cu-ft)
Phase 1	38.1	0.01	2	120	1500	0.004	1.01	30	0.2586	0.10	0.108	0.34	1.1	1.7	14905
Phase 1	38.1	0.01	5	120	1500	0.004	1.52	30	0.3903	0.10	0.108	0.34	1.6	2.8	22493
Phase 1	38.1	0.01	10	120	1500	0.004	1.86	30	0.4771	0.10	0.108	0.34	2.0	3.5	27500
Phase 1	38.1	0.01	25	120	1500	0.004	2.28	30	0.5867	0.10	0.108	0.34	2.4	4.3	33816
Phase 1	38.1	0.01	50	120	1500	0.004	2.60	30	0.6683	0.11	0.120	0.34	3.0	5.3	38644

POST DEVELOPMENT HYDROLOGY															
Subarea	Area (acres)	% IMP	Frequency	Soil Type	Length (ft)	Slope (ft/ft)	Isohyet (in)	Tc Calculated (min)	Intensity (in/hr)	Cu	Cd	Fire Factor	Flow Rate (cfs)	Burned Flow Rate (cfs)	Volume (cu-ft)
Phase 1	38.1	0.12	2	120	1500	0.004	1.01	30	0.2586	0.10	0.196	0.34	1.9	2.5	27050
Phase 1	38.1	0.12	5	120	1500	0.004	1.52	30	0.3903	0.10	0.196	0.34	2.9	4.0	40820
Phase 1	38.1	0.12	10	120	1500	0.004	1.86	30	0.4771	0.10	0.196	0.34	3.6	4.9	49907
Phase 1	38.1	0.12	25	120	1500	0.004	2.28	30	0.5867	0.10	0.196	0.34	4.4	6.1	61370
Phase 1	38.1	0.12	50	120	1500	0.004	2.60	30	0.6683	0.11	0.206	0.34	5.3	7.3	70012
Phase 1	38.1	0.12	3/4" STORM	120	1500	0.004	0.75	30	0.1928	0.10	0.196	0.34	1.4	1.8	20163
Phase 1	38.1	0.12	85TH %	120	1500	0.004	0.35	30	0.0900	0.10	0.196	0.34	0.7	0.8	9409

Table 5: Phase 2 Detail Analysis

PRE DEVELOPMENT HYDROLOGY															
Subarea	Area (acres)	% IMP	Frequency	Soil Type	Length (ft)	Slope (ft/ft)	Isohyet (in)	Tc Calculated (min)	Intensity (in/hr)	Cu	Cd	Fire Factor	Flow Rate (cfs)	Burned Flow Rate (cfs)	Volume (cu-ft)
Phase 2	37.8	0.01	2	120	1500	0.004	1.01	30	0.2586	0.10	0.108	0.34	1.1	1.7	14788
Phase 2	37.8	0.01	5	120	1500	0.004	1.52	30	0.3903	0.10	0.108	0.34	1.6	2.7	22316
Phase 2	37.8	0.01	10	120	1500	0.004	1.86	30	0.4771	0.10	0.108	0.34	1.9	3.4	27283
Phase 2	37.8	0.01	25	120	1500	0.004	2.28	30	0.5867	0.10	0.108	0.34	2.4	4.3	33550
Phase 2	37.8	0.01	50	120	1500	0.004	2.60	30	0.6683	0.11	0.120	0.34	3.0	5.2	38340

POST DEVELOPMENT HYDROLOGY															
Subarea	Area (acres)	% IMP	Frequency	Soil Type	Length (ft)	Slope (ft/ft)	Isohyet (in)	Tc Calculated (min)	Intensity (in/hr)	Cu	Cd	Fire Factor	Flow Rate (cfs)	Burned Flow Rate (cfs)	Volume (cu-ft)
Phase 2	37.8	0.12	2	120	1500	0.004	1.01	30	0.2586	0.10	0.196	0.34	1.9	2.5	26837
Phase 2	37.8	0.12	5	120	1500	0.004	1.52	30	0.3903	0.10	0.196	0.34	2.9	3.9	40499
Phase 2	37.8	0.12	10	120	1500	0.004	1.86	30	0.4771	0.10	0.196	0.34	3.5	4.9	49514
Phase 2	37.8	0.12	25	120	1500	0.004	2.28	30	0.5867	0.10	0.196	0.34	4.3	6.1	60887
Phase 2	37.8	0.12	50	120	1500	0.004	2.60	30	0.6683	0.11	0.206	0.34	5.2	7.2	69461
Phase 2	37.8	0.12	3/4" STORM	120	1500	0.004	0.75	30	0.1928	0.10	0.196	0.34	1.4	1.8	20004
Phase 2	37.8	0.12	85TH %	120	1500	0.004	0.35	30	0.0900	0.10	0.196	0.34	0.7	0.8	9335

Table 6: OFF-SITE DETAIL ANALYSIS

OFF-SITE HYDROLOGY															
Project	Area (acres)	% IMP	Frequency	Soil Type	Length (ft)	Slope (ft/ft)	Isohyet (in)	Tc Calculated (min)	Intensity (in/hr)	Cu	Cd	Fire Factor	Flow Rate (cfs)	Burned Flow Rate (cfs)	Volume (cu-ft)
Subarea A	40	0.01	2	120	617	0.004	1.01	30	0.2586	0.10	0.108	0.34	1.1	1.8	15649
Subarea A	40	0.01	5	120	617	0.004	1.52	30	0.3903	0.10	0.108	0.34	1.7	2.9	23614
Subarea A	40	0.01	10	120	617	0.004	1.86	30	0.4771	0.10	0.108	0.34	2.1	3.6	28871
Subarea A	40	0.01	25	120	617	0.004	2.28	30	0.5867	0.10	0.108	0.34	2.5	4.6	35503
Subarea A	40	0.01	50	120	617	0.004	2.60	30	0.6683	0.11	0.120	0.34	3.2	5.6	40571
Subarea B	21	0.01	2	120	883	0.004	1.01	30	0.2586	0.10	0.108	0.34	0.6	1.0	8216
Subarea B	21	0.01	5	120	883	0.004	1.52	30	0.3903	0.10	0.108	0.34	0.9	1.5	12398
Subarea B	21	0.01	10	120	883	0.004	1.86	30	0.4771	0.10	0.108	0.34	1.1	1.9	15157
Subarea B	21	0.01	25	120	883	0.004	2.28	30	0.5867	0.10	0.108	0.34	1.3	2.4	18639
Subarea B	21	0.01	50	120	883	0.004	2.60	30	0.6683	0.11	0.120	0.34	1.7	2.9	21300

Table 6: COMULATIVE PROJECT IMPACT

CUMULATIVE PROJECT IMPACT (OFFSITE+PHASE 1+PHASE2)							
Project	Area (acres)	DESIGN STORM FREQUENCY	PRE DEVELOPMENT		POST DEVELOPMENT		Δ VOLUME (CU-FT)
			FLOW RATE (CFS)	RUNOFF VOLUME (CU-FT)	FLOW RATE (CFS)	RUNOFF VOLUME (CU-FT)	
Antelope	136.9	2	3.8	53558	5.6	77752	24194
Antelope	136.9	5	5.8	80821	8.4	117331	36510
Antelope	136.9	10	7.1	98811	10.2	143449	44638
Antelope	136.9	25	8.7	121508	12.6	176399	54891
Antelope	136.9	50	10.9	138855	15.3	201344	62489
VOLUME MITIGATED = 66,600 CU-FT							

Peak Flow Hydrologic Analysis

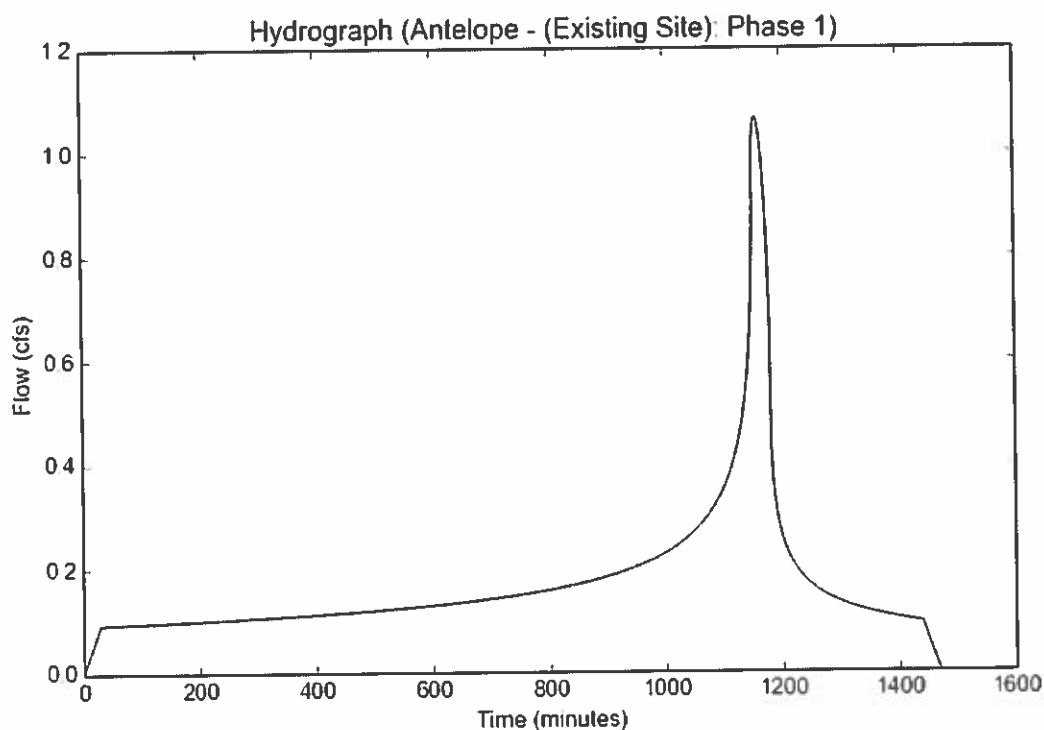
File location: C:/Users/yramos/Desktop/CSV, hydrocalc/Impervious 12%/Antelope - (Existing Site) - Phase 1-2 yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	2-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (2-yr) Rainfall Depth (in)	1.0062
Peak Intensity (in/hr)	0.2586
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.108
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.0642
Burned Peak Flow Rate (cfs)	1.7301
24-Hr Clear Runoff Volume (ac-ft)	0.3422
24-Hr Clear Runoff Volume (cu-ft)	14905.2935



Peak Flow Hydrologic Analysis

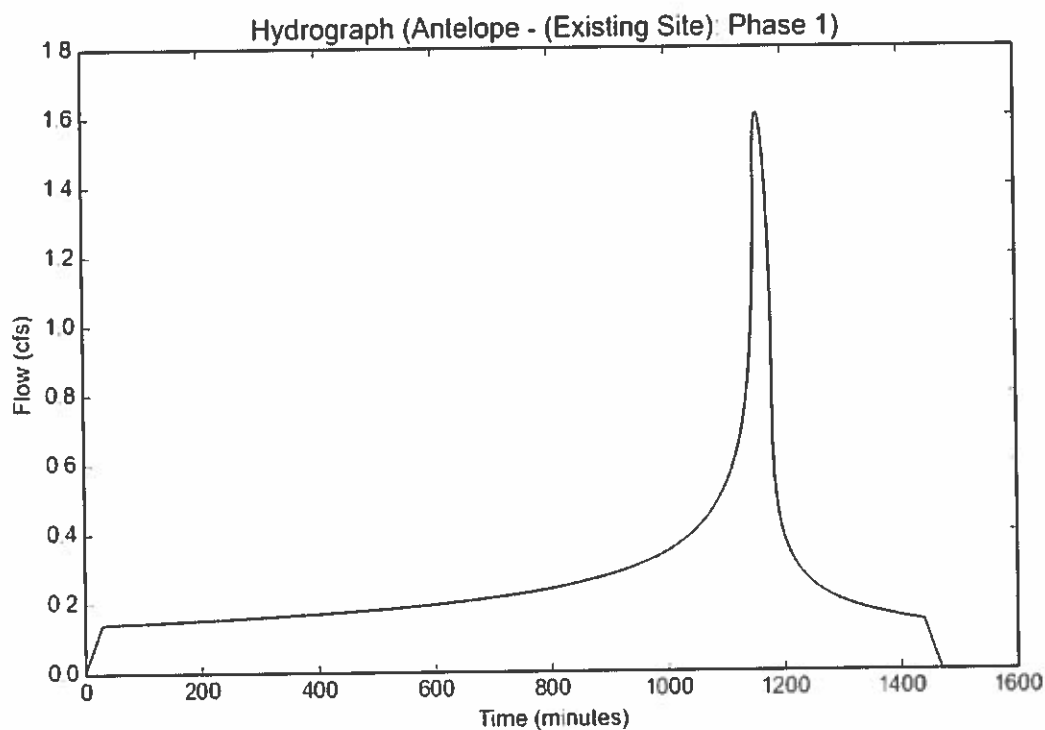
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	5-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (5-yr) Rainfall Depth (in)	1.5184
Peak Intensity (in/hr)	0.3903
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.108
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.6059
Burned Peak Flow Rate (cfs)	2.7549
24-Hr Clear Runoff Volume (ac-ft)	0.5164
24-Hr Clear Runoff Volume (cu-ft)	22492.7426



Peak Flow Hydrologic Analysis

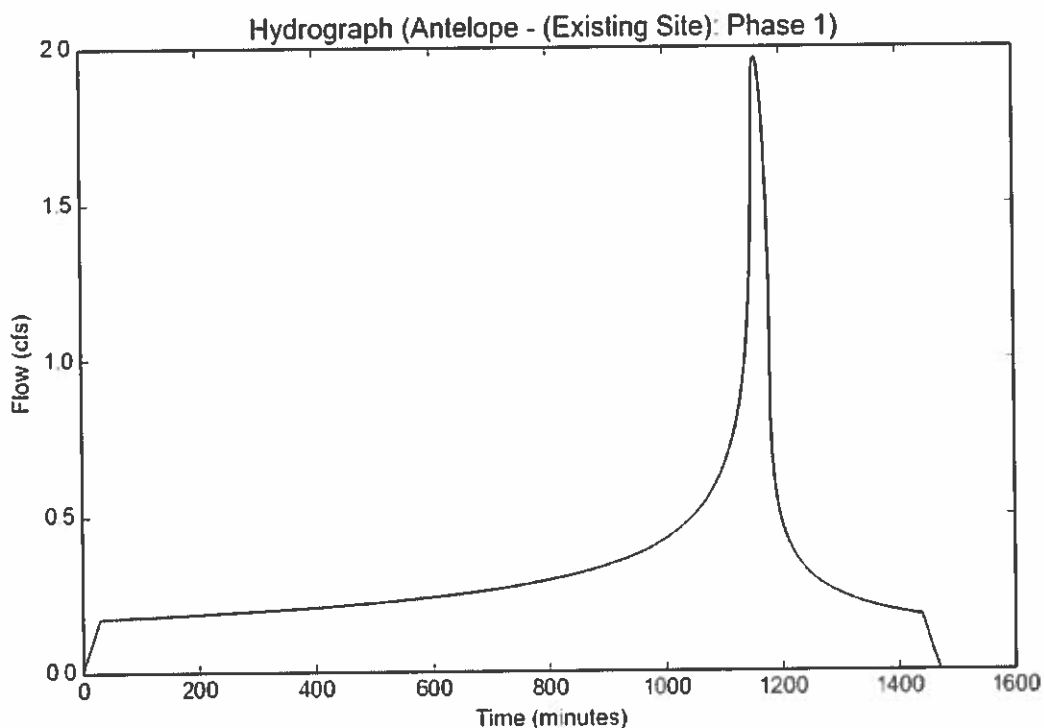
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	10-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (10-yr) Rainfall Depth (in)	1.8564
Peak Intensity (in/hr)	0.4771
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.108
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.9633
Burned Peak Flow Rate (cfs)	3.4515
24-Hr Clear Runoff Volume (ac-ft)	0.6313
24-Hr Clear Runoff Volume (cu-ft)	27499.6887



Peak Flow Hydrologic Analysis

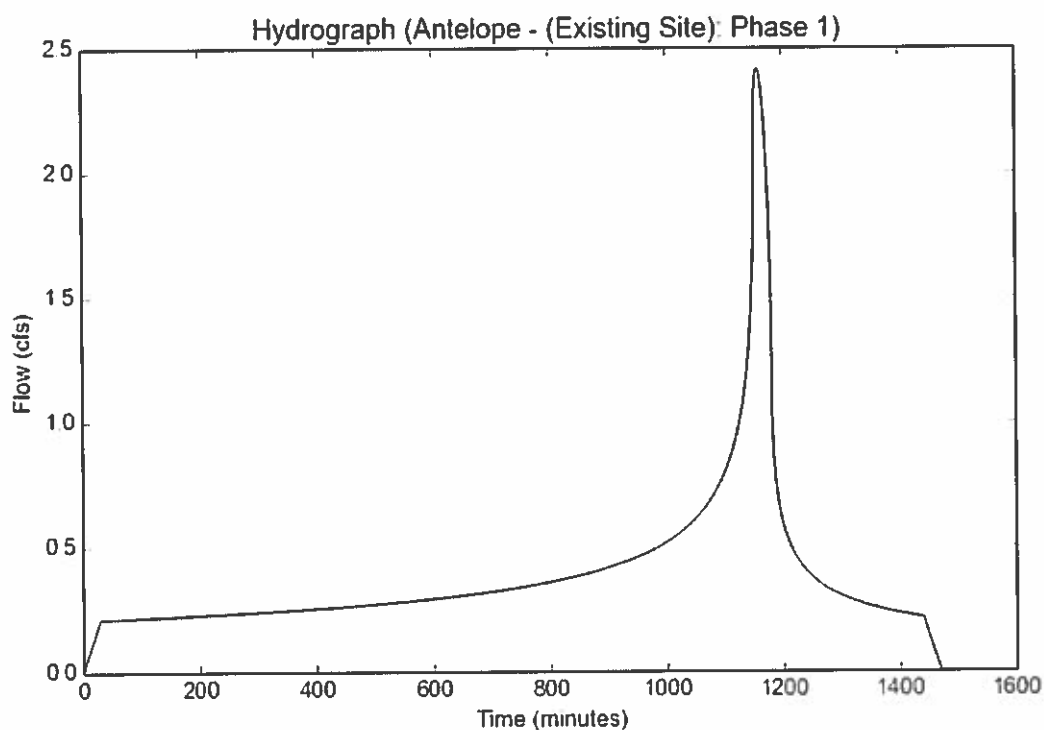
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	25-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (25-yr) Rainfall Depth (in)	2.2828
Peak Intensity (in/hr)	0.5867
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.108
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	2.4143
Burned Peak Flow Rate (cfs)	4.3476
24-Hr Clear Runoff Volume (ac-ft)	0.7763
24-Hr Clear Runoff Volume (cu-ft)	33816.1438



Peak Flow Hydrologic Analysis

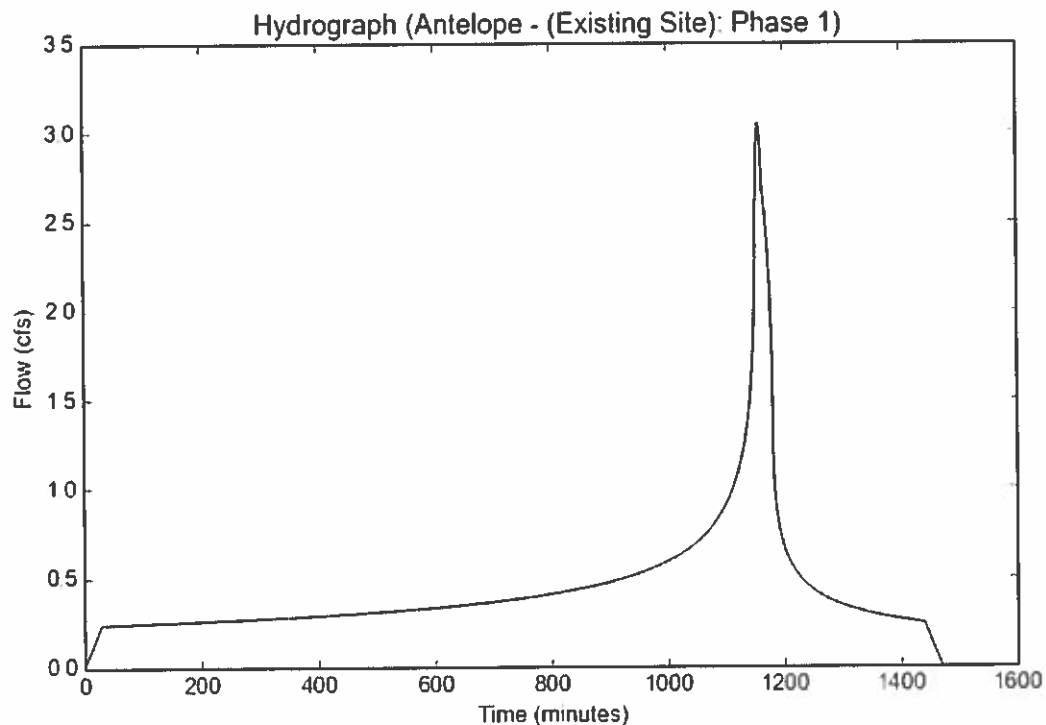
File location: C:/Users/yramos/Desktop/CSV, hydrocalc/Impervious 12%/Antelope - (Existing Site) - Phase 1-50yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	50-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (50-yr) Rainfall Depth (in)	2.6
Peak Intensity (in/hr)	0.6683
Undeveloped Runoff Coefficient (Cu)	0.1117
Developed Runoff Coefficient (Cd)	0.1196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	3.0448
Burned Peak Flow Rate (cfs)	5.2899
24-Hr Clear Runoff Volume (ac-ft)	0.8871
24-Hr Clear Runoff Volume (cu-ft)	38644.2402



Peak Flow Hydrologic Analysis

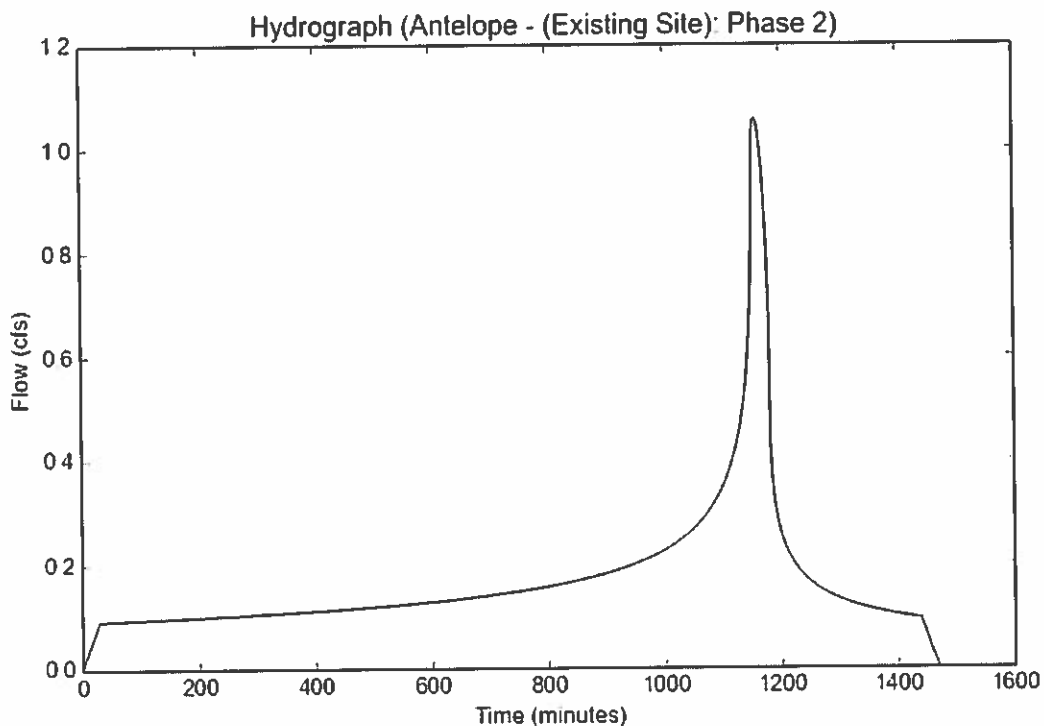
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	2-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (2-yr) Rainfall Depth (in)	1.0062
Peak Intensity (in/hr)	0.2586
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.108
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.0558
Burned Peak Flow Rate (cfs)	1.7165
24-Hr Clear Runoff Volume (ac-ft)	0.3395
24-Hr Clear Runoff Volume (cu-ft)	14787.929



Peak Flow Hydrologic Analysis

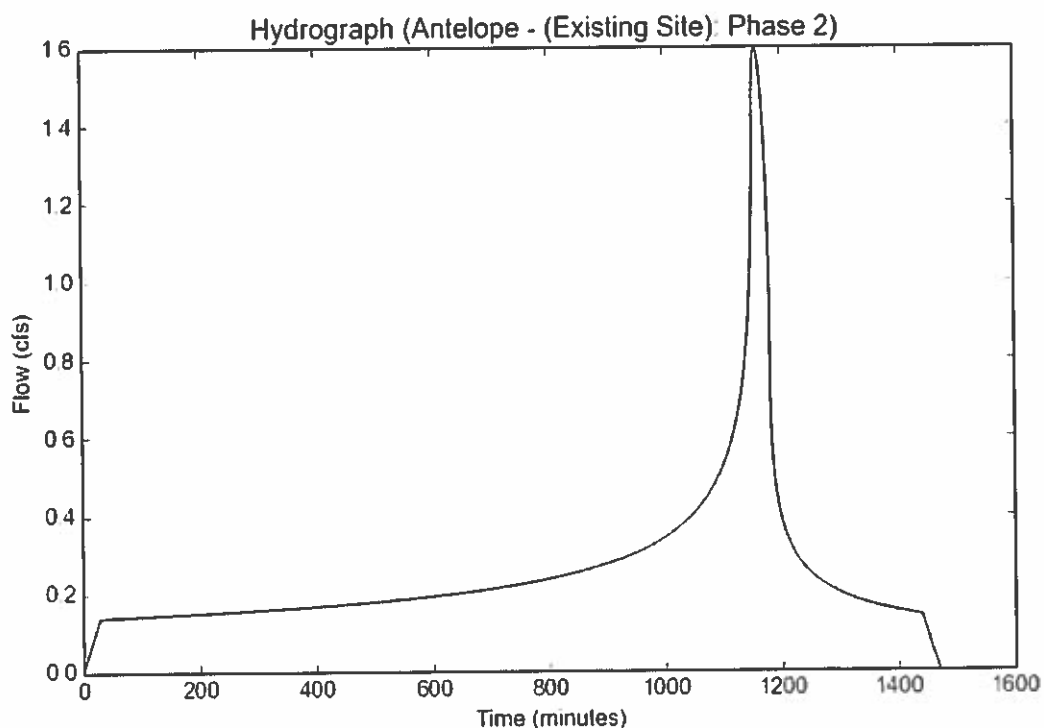
File location: C:/Users/yramos/Desktop/CSV, hydrocalc/Impervious 12%/Antelope - (Existing Site) - Phase 2-5 yr.pdf
Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	5-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (5-yr) Rainfall Depth (in)	1.5184
Peak Intensity (in/hr)	0.3903
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.108
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.5932
Burned Peak Flow Rate (cfs)	2.7332
24-Hr Clear Runoff Volume (ac-ft)	0.5123
24-Hr Clear Runoff Volume (cu-ft)	22315.6344



Peak Flow Hydrologic Analysis

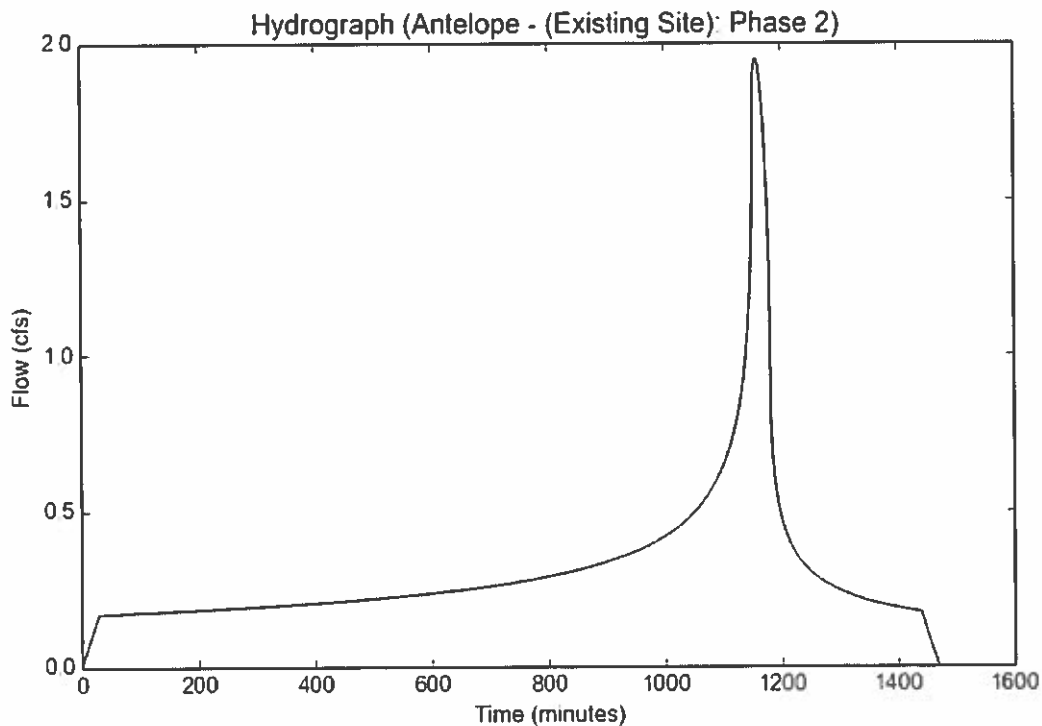
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	10-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (10-yr) Rainfall Depth (in)	1.8564
Peak Intensity (in/hr)	0.4771
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.108
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.9479
Burned Peak Flow Rate (cfs)	3.4243
24-Hr Clear Runoff Volume (ac-ft)	0.6263
24-Hr Clear Runoff Volume (cu-ft)	27283.1557



Peak Flow Hydrologic Analysis

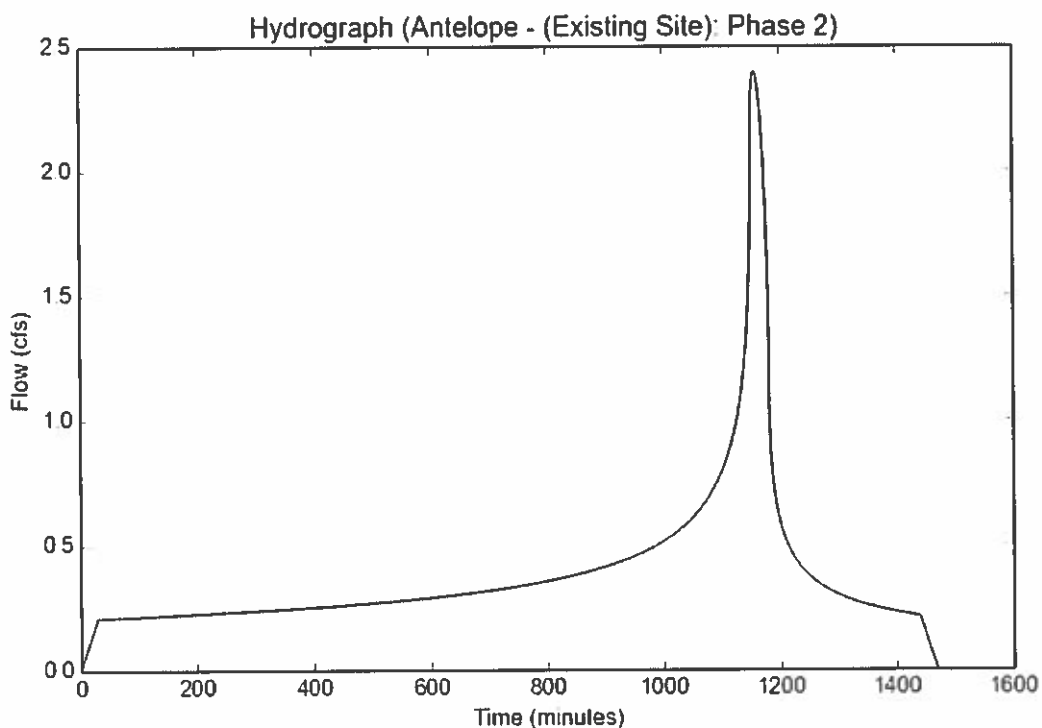
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	25-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (25-yr) Rainfall Depth (in)	2.2828
Peak Intensity (in/hr)	0.5867
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.108
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	2.3953
Burned Peak Flow Rate (cfs)	4.3134
24-Hr Clear Runoff Volume (ac-ft)	0.7702
24-Hr Clear Runoff Volume (cu-ft)	33549.875



Peak Flow Hydrologic Analysis

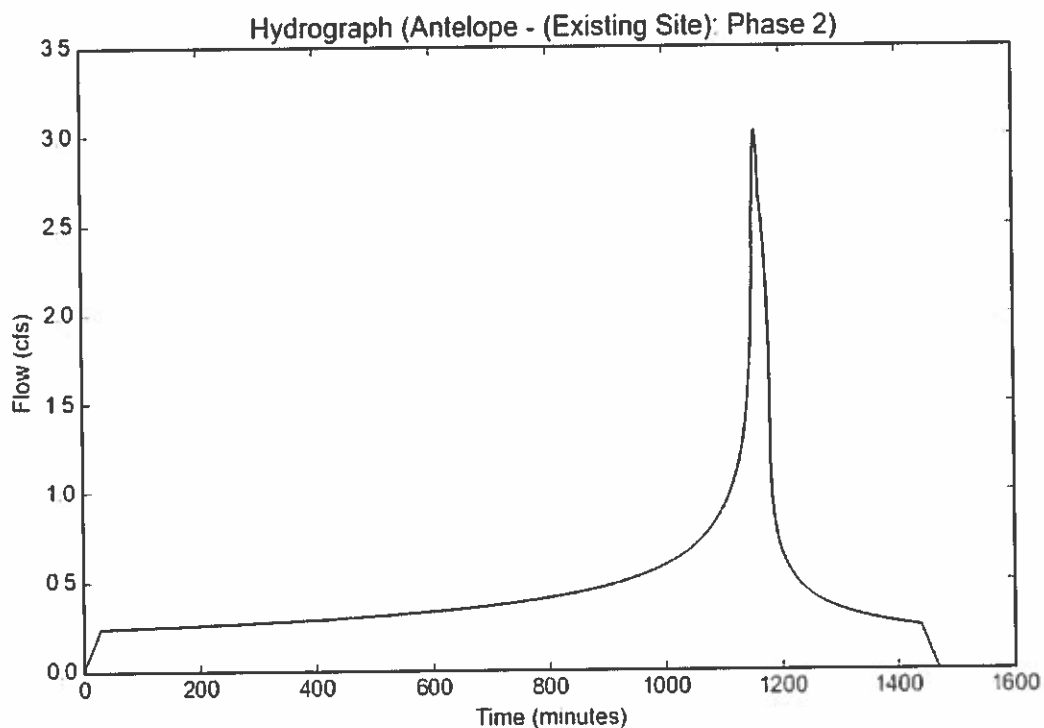
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Existing Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	50-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (50-yr) Rainfall Depth (in)	2.6
Peak Intensity (in/hr)	0.6683
Undeveloped Runoff Coefficient (Cu)	0.1117
Developed Runoff Coefficient (Cd)	0.1196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	3.0208
Burned Peak Flow Rate (cfs)	5.2483
24-Hr Clear Runoff Volume (ac-ft)	0.8802
24-Hr Clear Runoff Volume (cu-ft)	38339.9549



Peak Flow Hydrologic Analysis

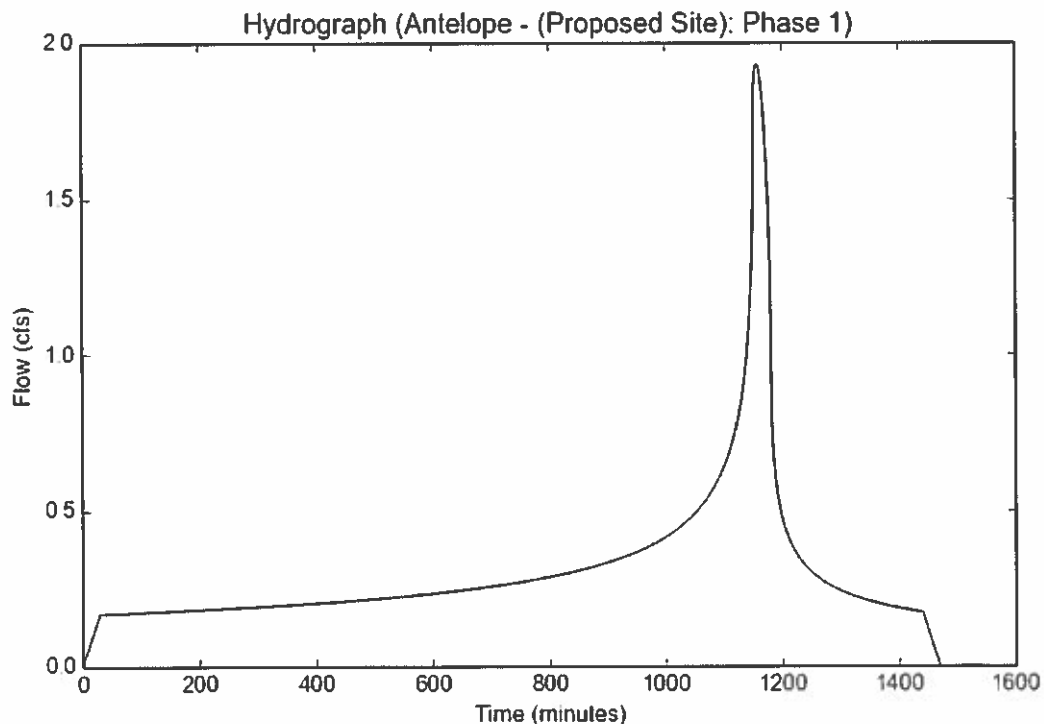
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	2-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (2-yr) Rainfall Depth (in)	1.0062
Peak Intensity (in/hr)	0.2586
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.9312
Burned Peak Flow Rate (cfs)	2.5315
24-Hr Clear Runoff Volume (ac-ft)	0.621
24-Hr Clear Runoff Volume (cu-ft)	27050.3474



Peak Flow Hydrologic Analysis

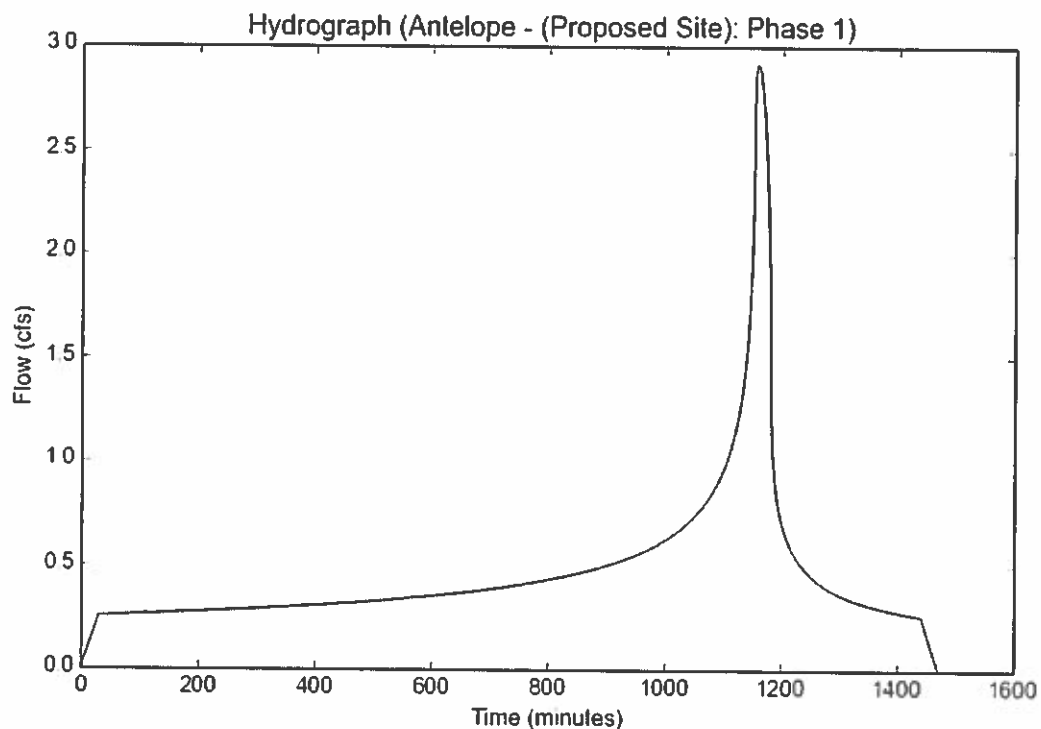
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	5-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (5-yr) Rainfall Depth (in)	1.5184
Peak Intensity (in/hr)	0.3903
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	2.9143
Burned Peak Flow Rate (cfs)	3.95
24-Hr Clear Runoff Volume (ac-ft)	0.9371
24-Hr Clear Runoff Volume (cu-ft)	40820.1625



Peak Flow Hydrologic Analysis

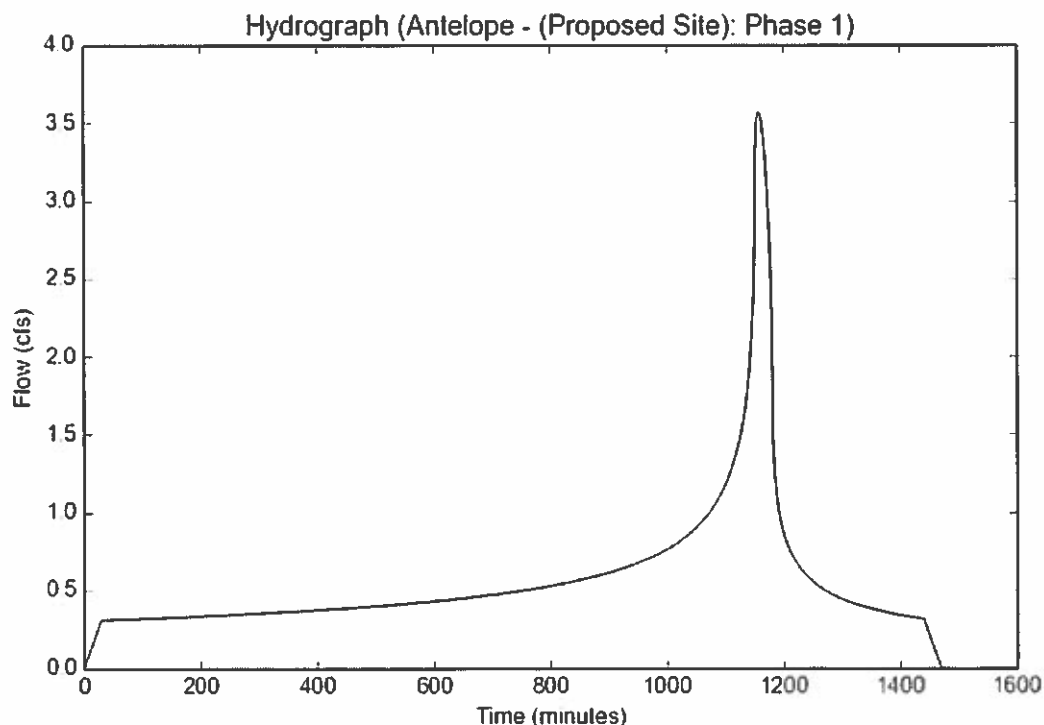
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	10-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (10-yr) Rainfall Depth (in)	1.8564
Peak Intensity (in/hr)	0.4771
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	3.5631
Burned Peak Flow Rate (cfs)	4.9044
24-Hr Clear Runoff Volume (ac-ft)	1.1457
24-Hr Clear Runoff Volume (cu-ft)	49906.8425



Peak Flow Hydrologic Analysis

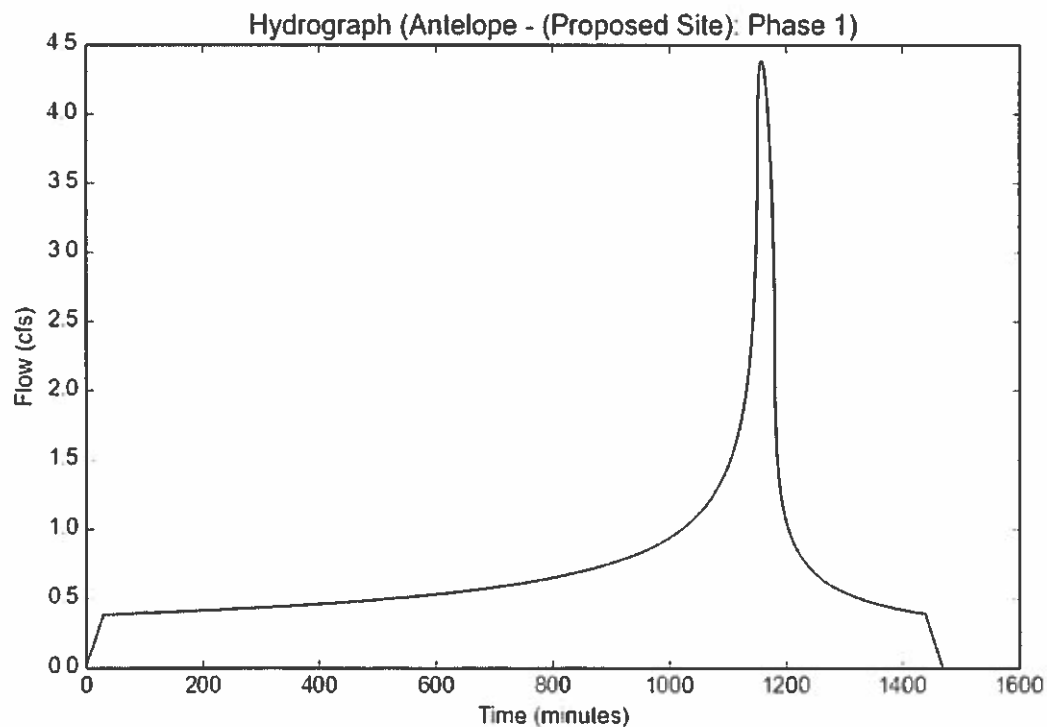
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	25-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (25-yr) Rainfall Depth (in)	2.2828
Peak Intensity (in/hr)	0.5867
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	4.3815
Burned Peak Flow Rate (cfs)	6.1241
24-Hr Clear Runoff Volume (ac-ft)	1.4089
24-Hr Clear Runoff Volume (cu-ft)	61370.0388



Peak Flow Hydrologic Analysis

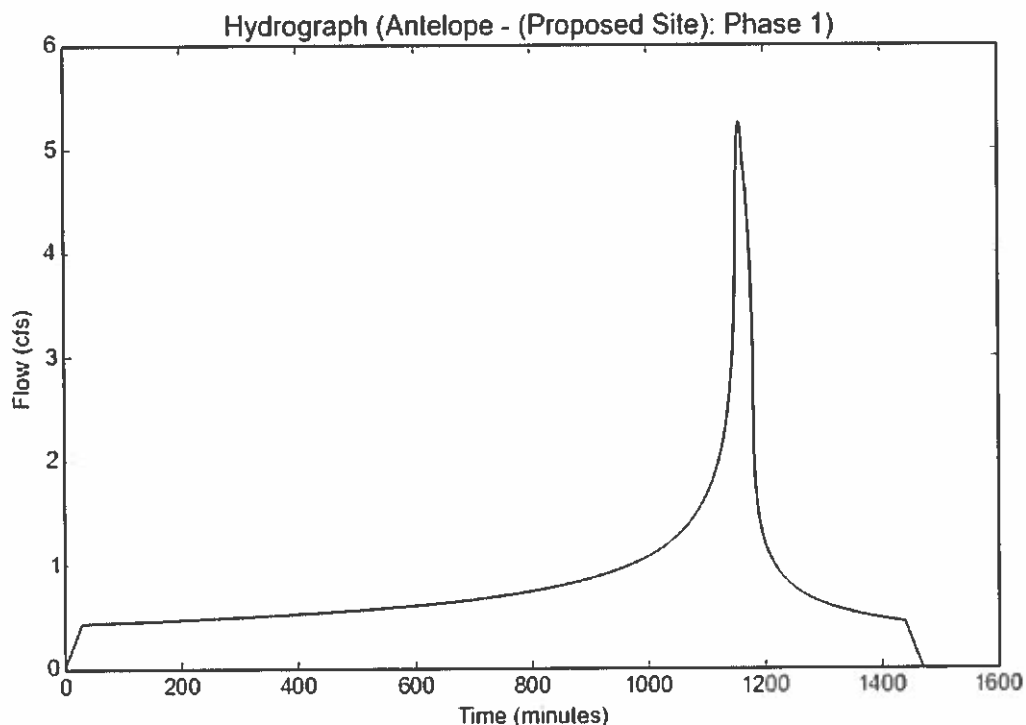
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 1
Area (ac)	38.1
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	50-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (50-yr) Rainfall Depth (in)	2.6
Peak Intensity (in/hr)	0.6683
Undeveloped Runoff Coefficient (Cu)	0.1117
Developed Runoff Coefficient (Cd)	0.2063
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	5.2525
Burned Peak Flow Rate (cfs)	7.2766
24-Hr Clear Runoff Volume (ac-ft)	1.6073
24-Hr Clear Runoff Volume (cu-ft)	70012.4452



Peak Flow Hydrologic Analysis

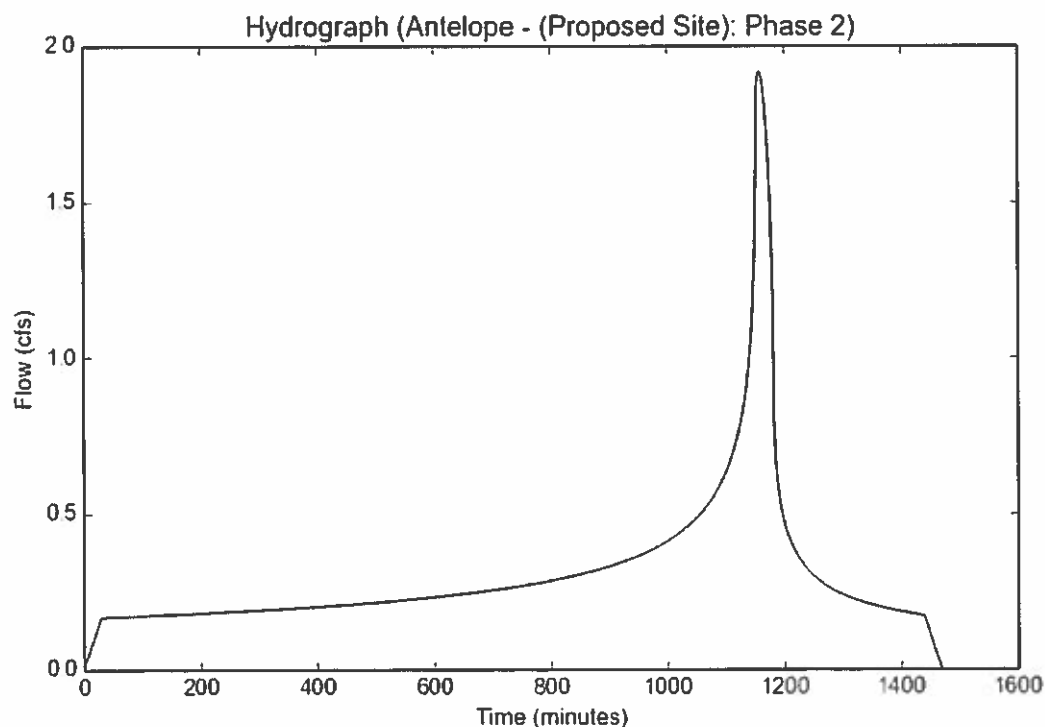
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	2-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (2-yr) Rainfall Depth (in)	1.0062
Peak Intensity (in/hr)	0.2586
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.916
Burned Peak Flow Rate (cfs)	2.5116
24-Hr Clear Runoff Volume (ac-ft)	0.6161
24-Hr Clear Runoff Volume (cu-ft)	26837.3525



Peak Flow Hydrologic Analysis

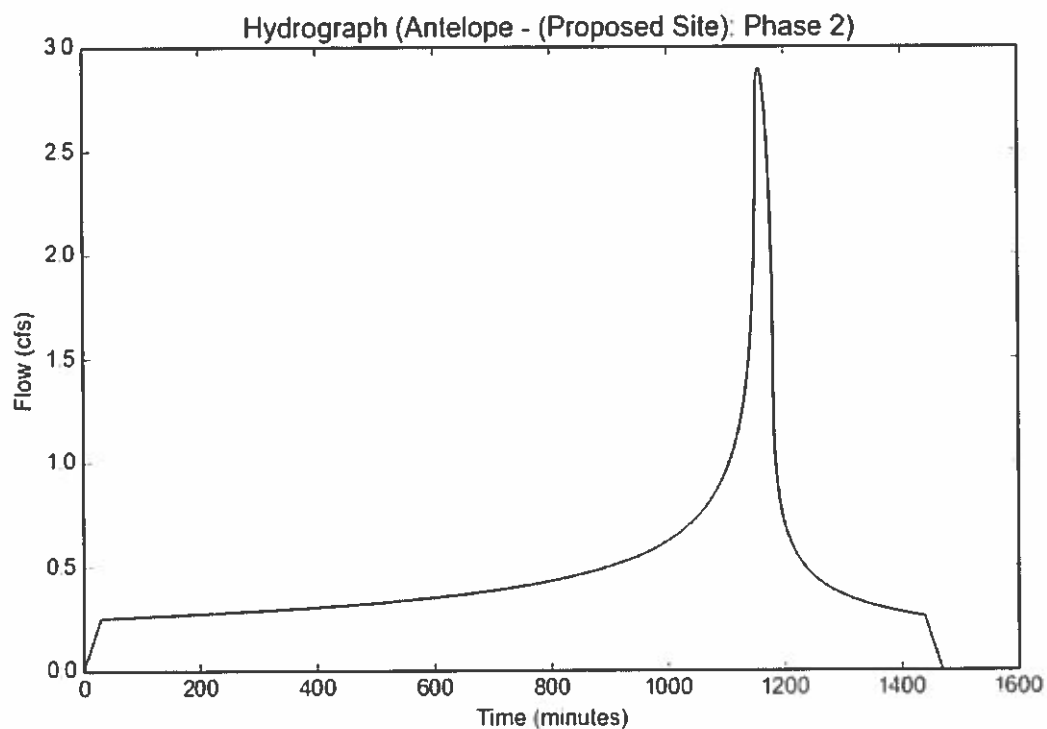
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	5-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (5-yr) Rainfall Depth (in)	1.5184
Peak Intensity (in/hr)	0.3903
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	2.8914
Burned Peak Flow Rate (cfs)	3.9189
24-Hr Clear Runoff Volume (ac-ft)	0.9297
24-Hr Clear Runoff Volume (cu-ft)	40498.7439



Peak Flow Hydrologic Analysis

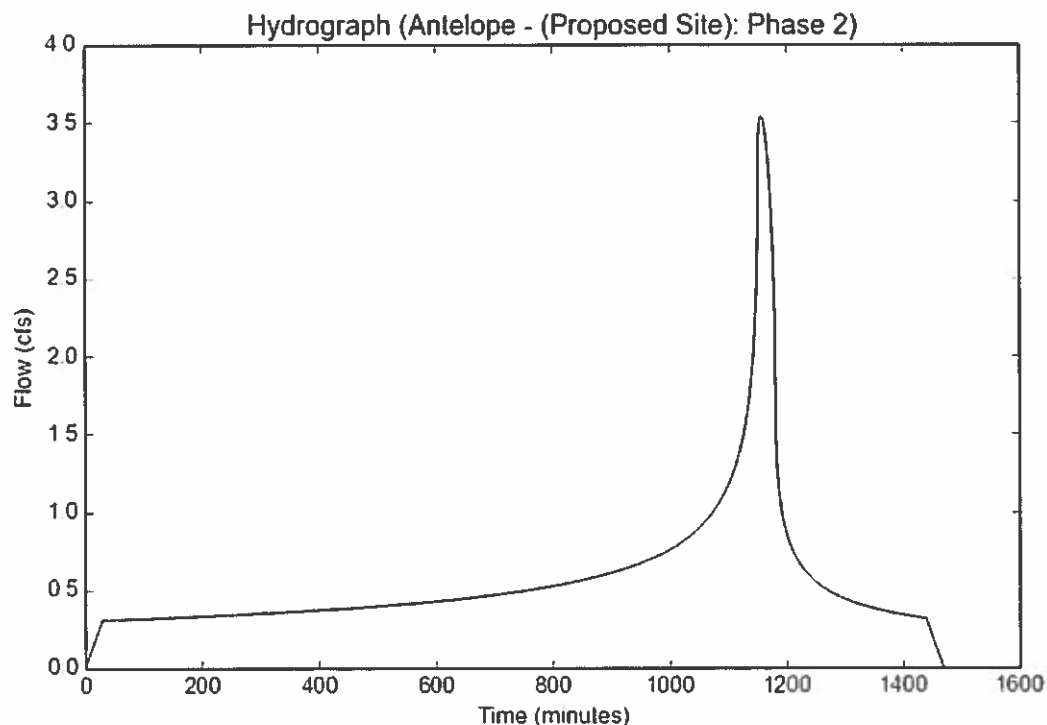
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	10-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (10-yr) Rainfall Depth (in)	1.8564
Peak Intensity (in/hr)	0.4771
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	3.535
Burned Peak Flow Rate (cfs)	4.8658
24-Hr Clear Runoff Volume (ac-ft)	1.1367
24-Hr Clear Runoff Volume (cu-ft)	49513.8752



Peak Flow Hydrologic Analysis

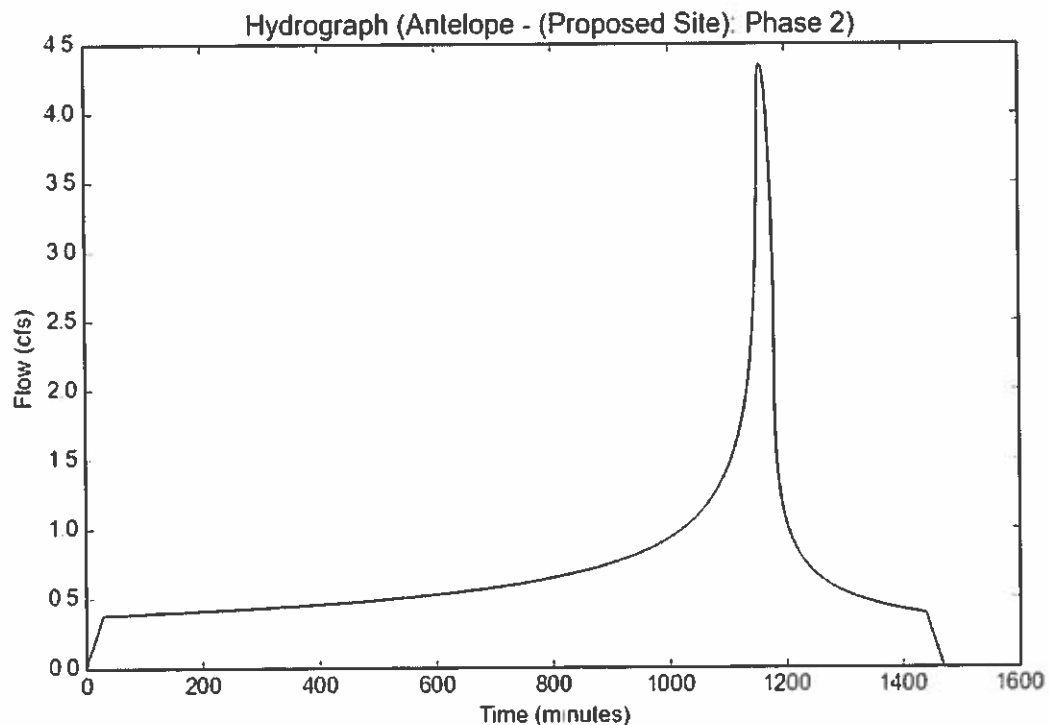
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	25-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (25-yr) Rainfall Depth (in)	2.2828
Peak Intensity (in/hr)	0.5867
Undeveloped Runoff Coefficient (Cu)	0.1
Developed Runoff Coefficient (Cd)	0.196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	4.347
Burned Peak Flow Rate (cfs)	6.0758
24-Hr Clear Runoff Volume (ac-ft)	1.3978
24-Hr Clear Runoff Volume (cu-ft)	60886.8102



Peak Flow Hydrologic Analysis

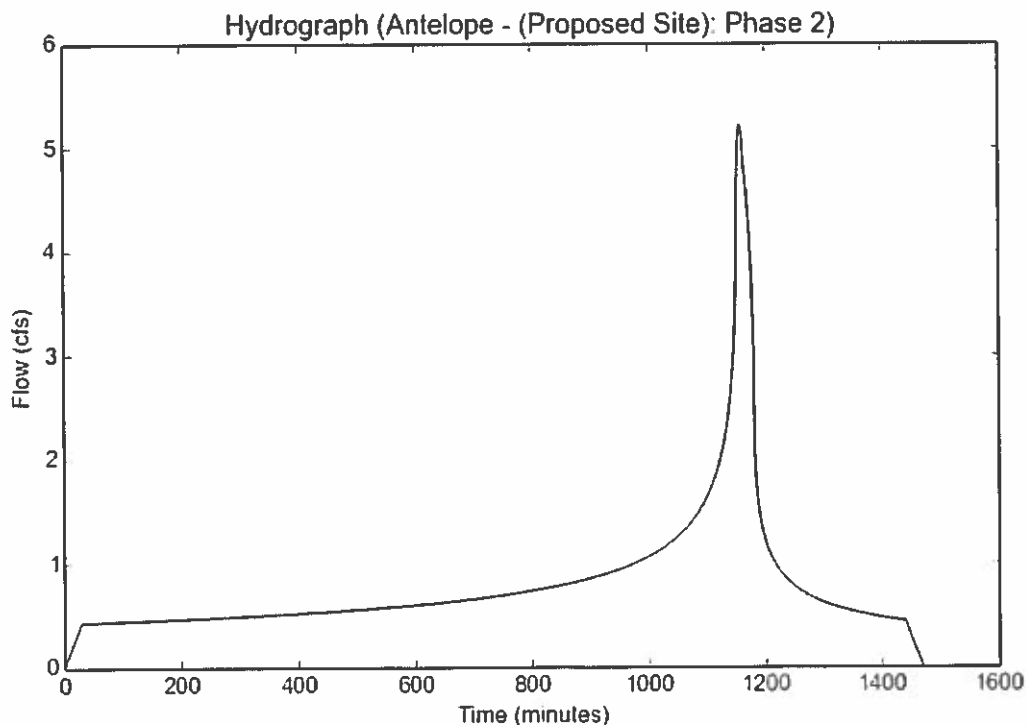
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - (Proposed Site)
Subarea ID	Phase 2
Area (ac)	37.8
Flow Path Length (ft)	1500.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.12
Soil Type	120
Design Storm Frequency	50-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (50-yr) Rainfall Depth (in)	2.6
Peak Intensity (in/hr)	0.6683
Undeveloped Runoff Coefficient (Cu)	0.1117
Developed Runoff Coefficient (Cd)	0.2063
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	5.2112
Burned Peak Flow Rate (cfs)	7.2193
24-Hr Clear Runoff Volume (ac-ft)	1.5946
24-Hr Clear Runoff Volume (cu-ft)	69461.1661



Peak Flow Hydrologic Analysis

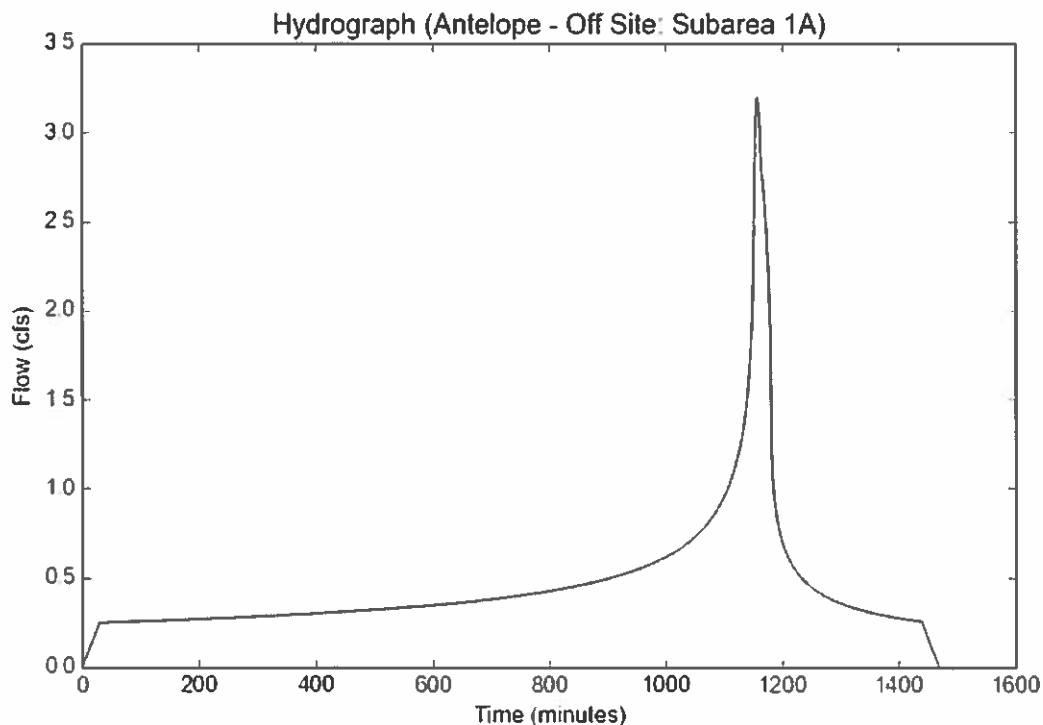
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - Off Site
Subarea ID	Subarea 1A
Area (ac)	40.0
Flow Path Length (ft)	617.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	50-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (50-yr) Rainfall Depth (in)	2.6
Peak Intensity (in/hr)	0.6683
Undeveloped Runoff Coefficient (Cu)	0.1117
Developed Runoff Coefficient (Cd)	0.1196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	3.1966
Burned Peak Flow Rate (cfs)	5.5537
24-Hr Clear Runoff Volume (ac-ft)	0.9314
24-Hr Clear Runoff Volume (cu-ft)	40571.3808



Peak Flow Hydrologic Analysis

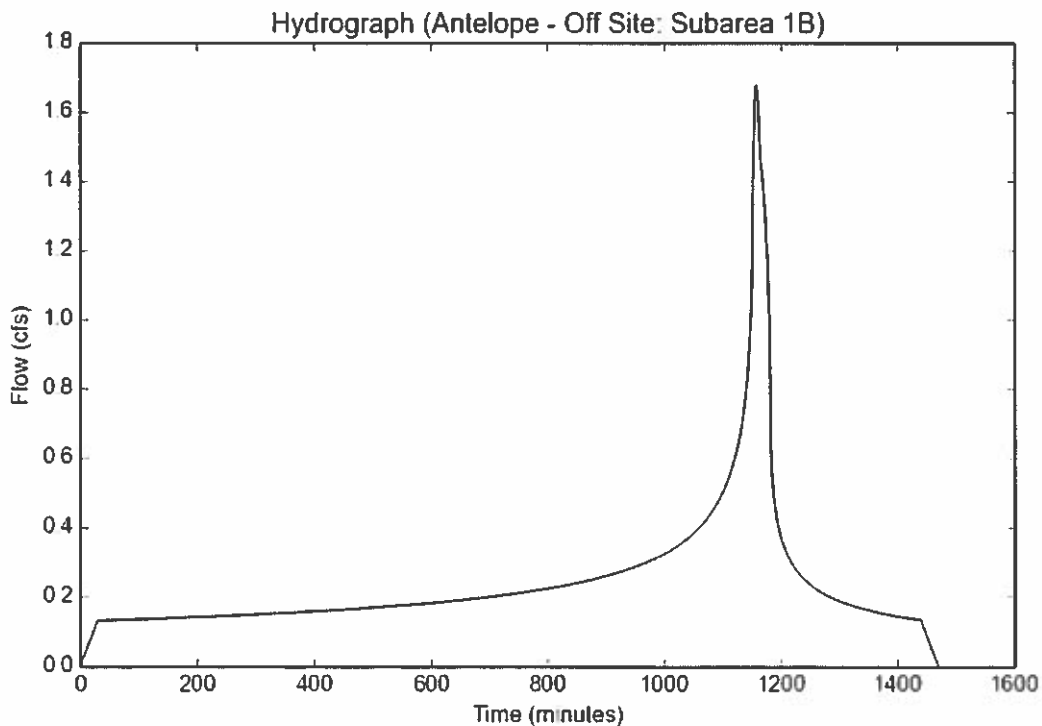
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Version: HydroCalc 0.3.0-beta

Input Parameters

Project Name	Antelope - Off Site
Subarea ID	Subarea 1B
Area (ac)	21.0
Flow Path Length (ft)	883.0
Flow Path Slope (vft/hft)	0.004
50-yr Rainfall Depth (in)	2.6
Percent Impervious	0.01
Soil Type	120
Design Storm Frequency	50-yr
Fire Factor	0.34
LID	False

Output Results

Modeled (50-yr) Rainfall Depth (in)	2.6
Peak Intensity (in/hr)	0.6683
Undeveloped Runoff Coefficient (Cu)	0.1117
Developed Runoff Coefficient (Cd)	0.1196
Time of Concentration (min)	30.0
Clear Peak Flow Rate (cfs)	1.6782
Burned Peak Flow Rate (cfs)	2.9157
24-Hr Clear Runoff Volume (ac-ft)	0.489
24-Hr Clear Runoff Volume (cu-ft)	21299.9749



APPENDIX A

- 1 1. IS A CONCRETE LAYER AND REGION
AND NOT RELATED FOR CONSTRUCTION
- 2 2. INTERIOR AND ALL ELECTRICAL EQUIPMENT
WILL BE LOCATED WITHIN THIS REGION
FOR A SECOND FLOOR
- 3 3. ANALYZING THE REGION MEANS THAT WE
ARE THE RESPONSIBILITY OF THE PROJECT
OWNER
- 4 4. WE'LL BE FINDING THE LOCATION
OF THE PROJECT FOR THE EFFECT OF THE
ON THE REGIONAL BASIS



CUMULATIVE PROJECT IMPACT									
Category	1970-74	1975-79	1980-84	1985-89	1990-94	1995-99	2000-04	2005-09	2010-14
1. New Construction	10	20	30	40	50	60	70	80	90
2. Renovation	15	25	35	45	55	65	75	85	95
3. Demolition	5	10	15	20	25	30	35	40	45
4. Other	2	4	6	8	10	12	14	16	18
Total	32	60	80	113	140	167	195	222	280

[illegible]

SITE PLAN	
INCORPORATED LOS ANGELES COUNTY, CA	
DATE: 11/11/08	SHEET: 0 2

[illegible]

PREPARED UNDER THE DIRECT SUPERVISION OF

COMMUNICATIONS
AND TELEVISION
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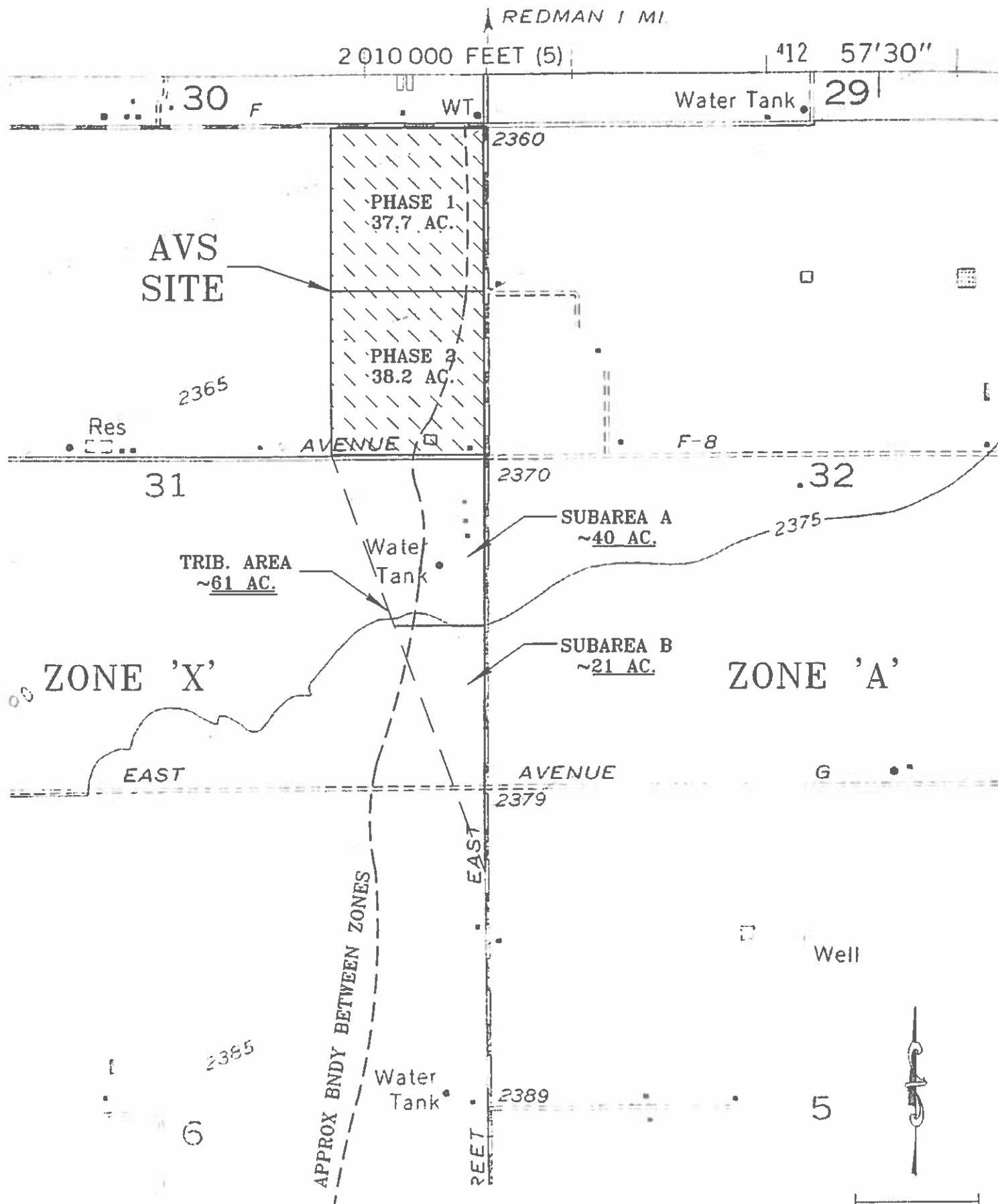
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APPENDIX B

OR

HYDROLOGY MAP

(PORTION ALPINE BUTTE 7.5 MINUTE QUAD)



APPENDIX C



MAP SCALE 1" = 2000'

1000 0 2000 4000
FEET

NFIP

PANEL 0475F

FIRM

FLOOD INSURANCE RATE MAP

LOS ANGELES COUNTY,

CALIFORNIA


AND INCORPORATED AREAS

PANEL 475 OF 2350

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	MAP NUMBER	PANEL	SUFFIX
LOS ANGELES COUNTY	065043	0475	F
LANCASTER CITY	065072	0475	F

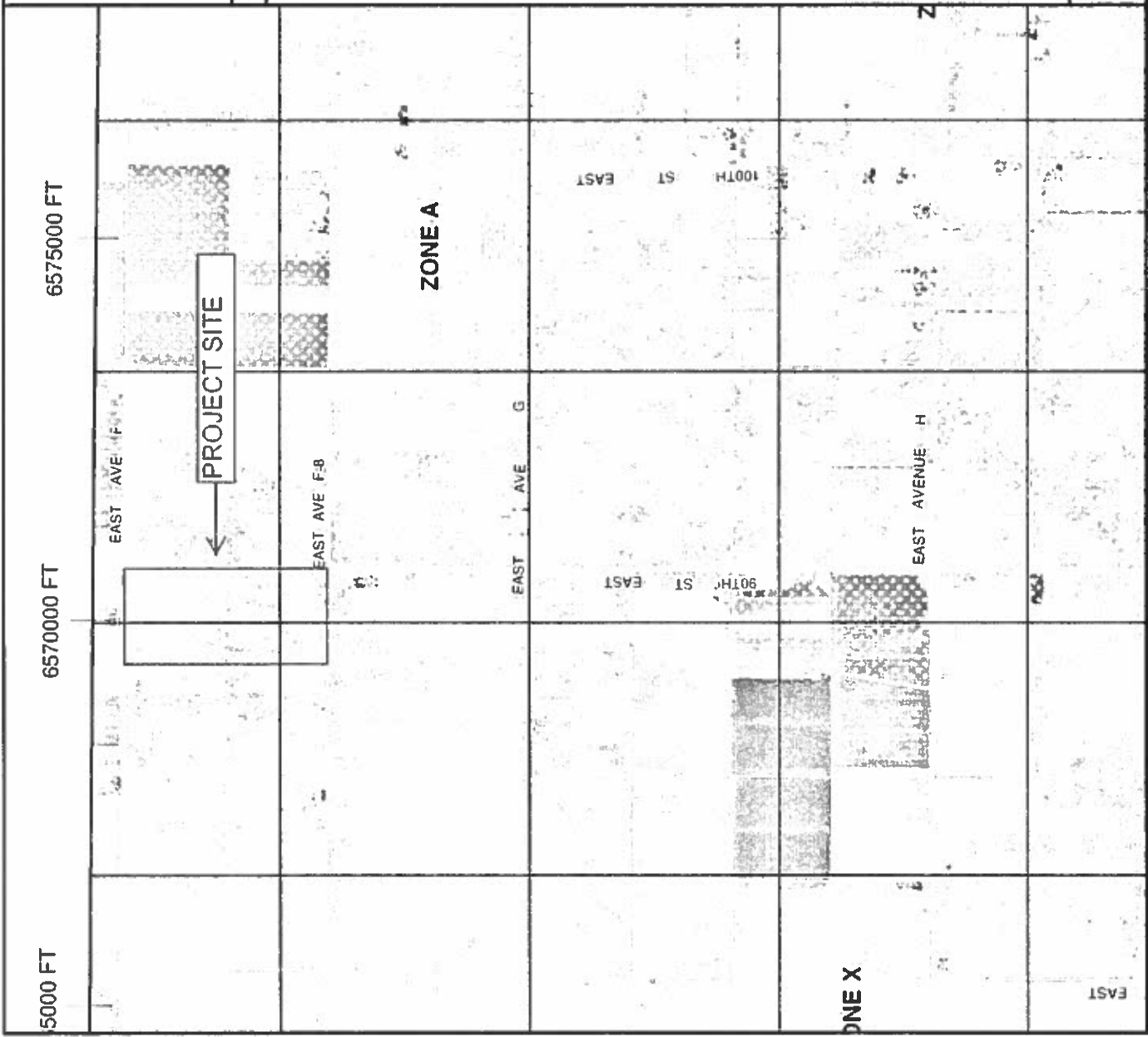


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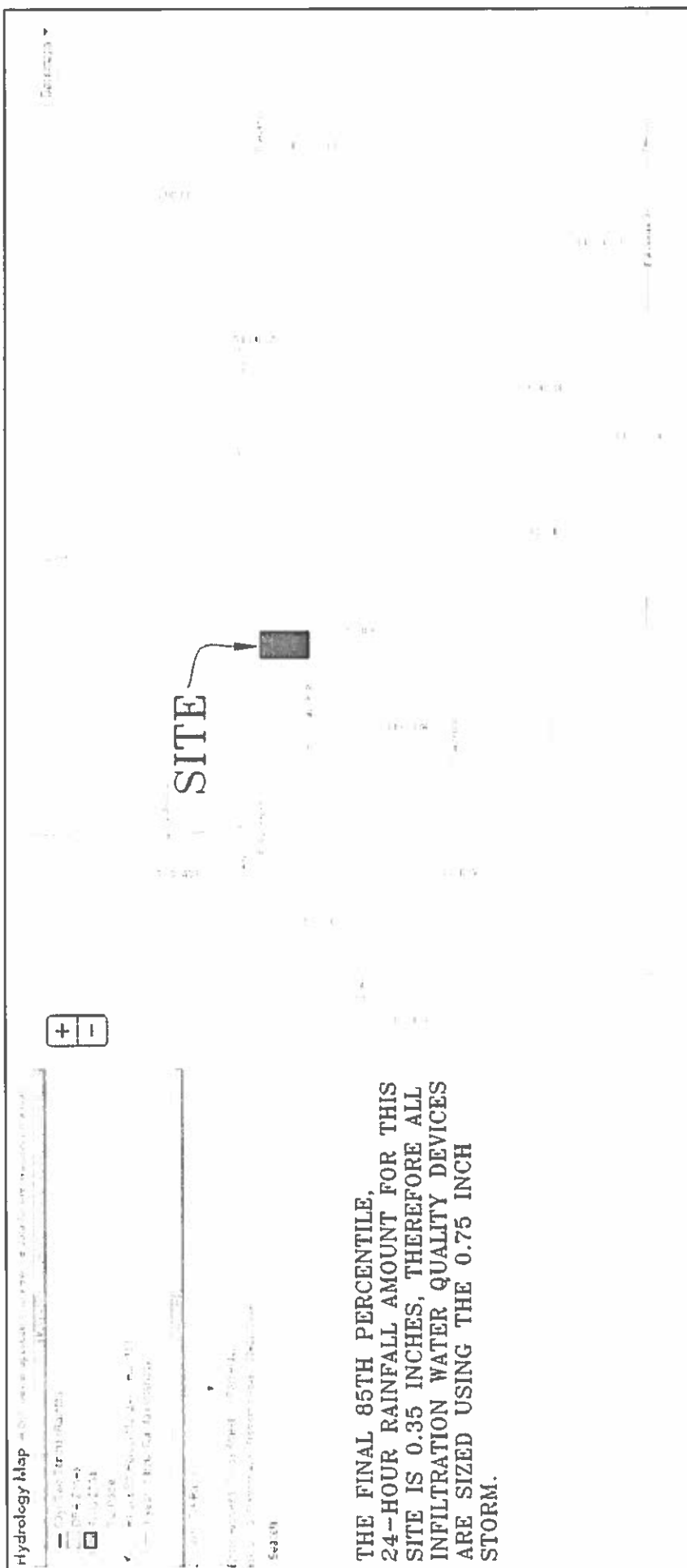
EFFECTIVE DATE
SEPTEMBER 26, 2008

Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-IRM On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps, check the FEMA Flood Map Store at www.msc.fema.gov



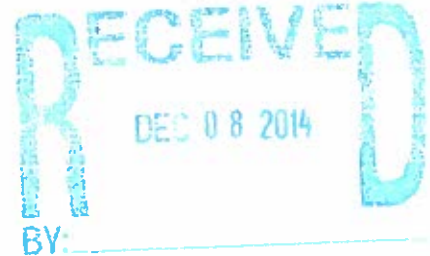
APPENDIX D





LANCASTER CHAMBER OF COMMERCE

December 1, 2014



Esther L. Valadez
Chair, Los Angeles County Regional Planning Commission
320 West Temple Street
Los Angeles, CA 90012

Dear Commissioner Valadez,

I am writing on behalf of the Lancaster Chamber of Commerce to express support for Antelope Valley Solar's (AVS's) solar energy project located in the Antelope Valley in unincorporated Los Angeles County. The project will be constructed in two phases, with a combined operating capacity of 7.45 megawatts. The first phase will generate approximately 4.45 megawatts of electricity, and the second phase will generate approximately 3.00 megawatts of electricity. In total, the project will generate enough electricity to power over 2,000 homes. The project will produce a local source of clean, renewable energy, help the County meet its ambitious greenhouse gas emission reduction targets and help meet state mandates to produce 33% renewable power by 2020.

Los Angeles County has been hard hit by the recession and construction jobs in the region have decreased by 26 percent since 2007. AVS's project will create approximately 40 construction jobs for each phase of the project. Additionally, 1-3 individuals will be employed throughout the life of the project to monitor the solar system and perform all required operations and maintenance services. Eighty-five percent (85%) of construction work is expected to come from the local workforce, and many of the construction subcontracts will be assigned to firms based in the region. In addition, the project has the potential to introduce over a million dollars into the local economy through construction materials purchases and tax revenues. In short, this project is economic stimulus our region desperately needs.

AVS has worked closely with the Los Angeles County Department of Regional Planning, state and local agencies, community groups and area residents to ensure the project is developed in a responsible manner. AVS's proposed project would have negligible environmental impacts, utilize existing transmission infrastructure, and enable the development of a cost-effective project to deliver clean, renewable, domestically-produced energy to the region.

AVS is an established solar developer with an excellent reputation for responsible solar development in the Antelope Valley. We appreciate the outreach efforts that AVS has undertaken, and we look forward to them being a part of our community. The Lancaster Chamber of Commerce encourages the Los Angeles County Regional Planning Commission to approve the Conditional Use Permit for the AVS solar project.

Sincerely,

Sandy Smith
Chief Executive Officer
Lancaster Chamber of Commerce

**ATTACHMENT 4
PHOTOS OF SITE**



Northeast Corner of Site



North Boundary of Site



East Boundary of Site



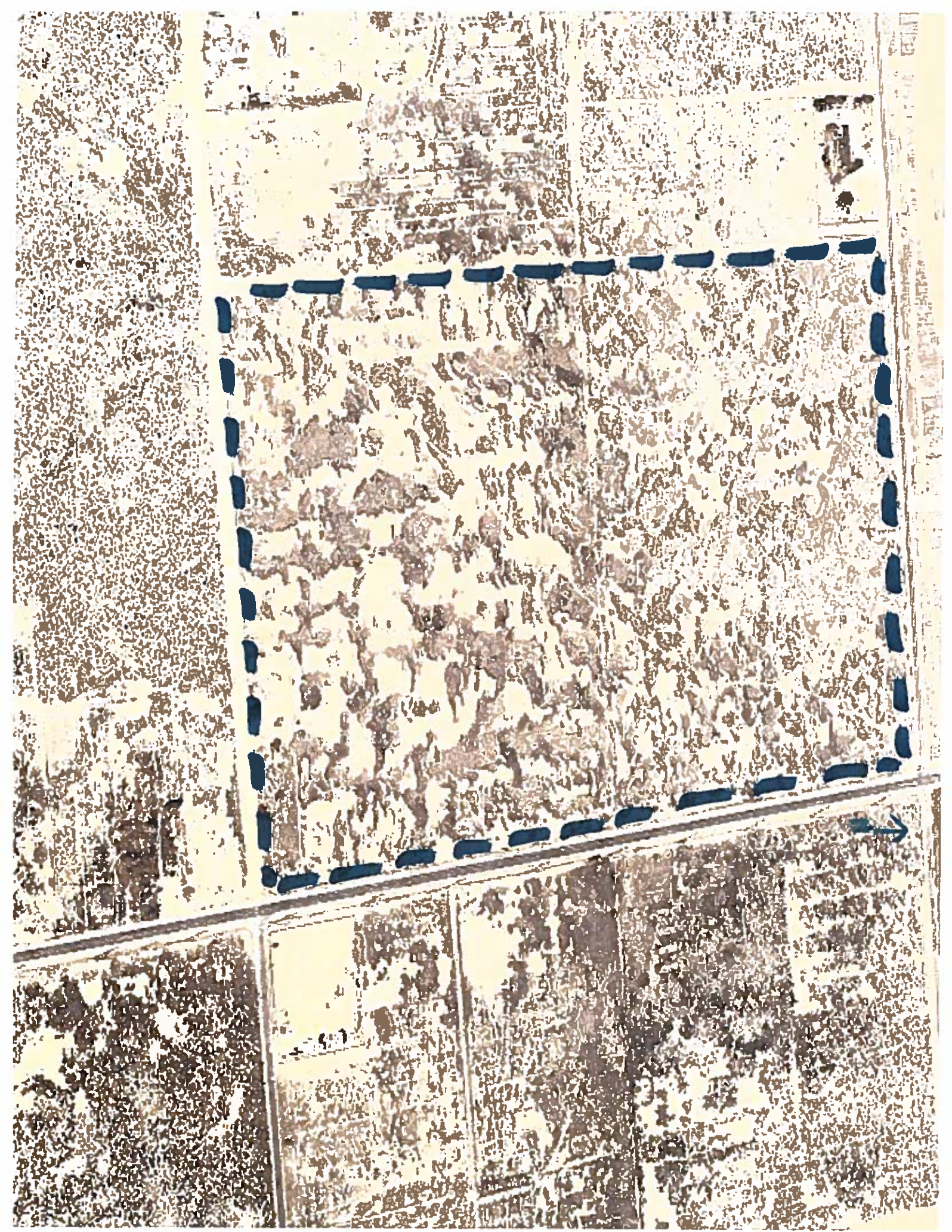
East Boundary of Site



Southeast Corner of Site

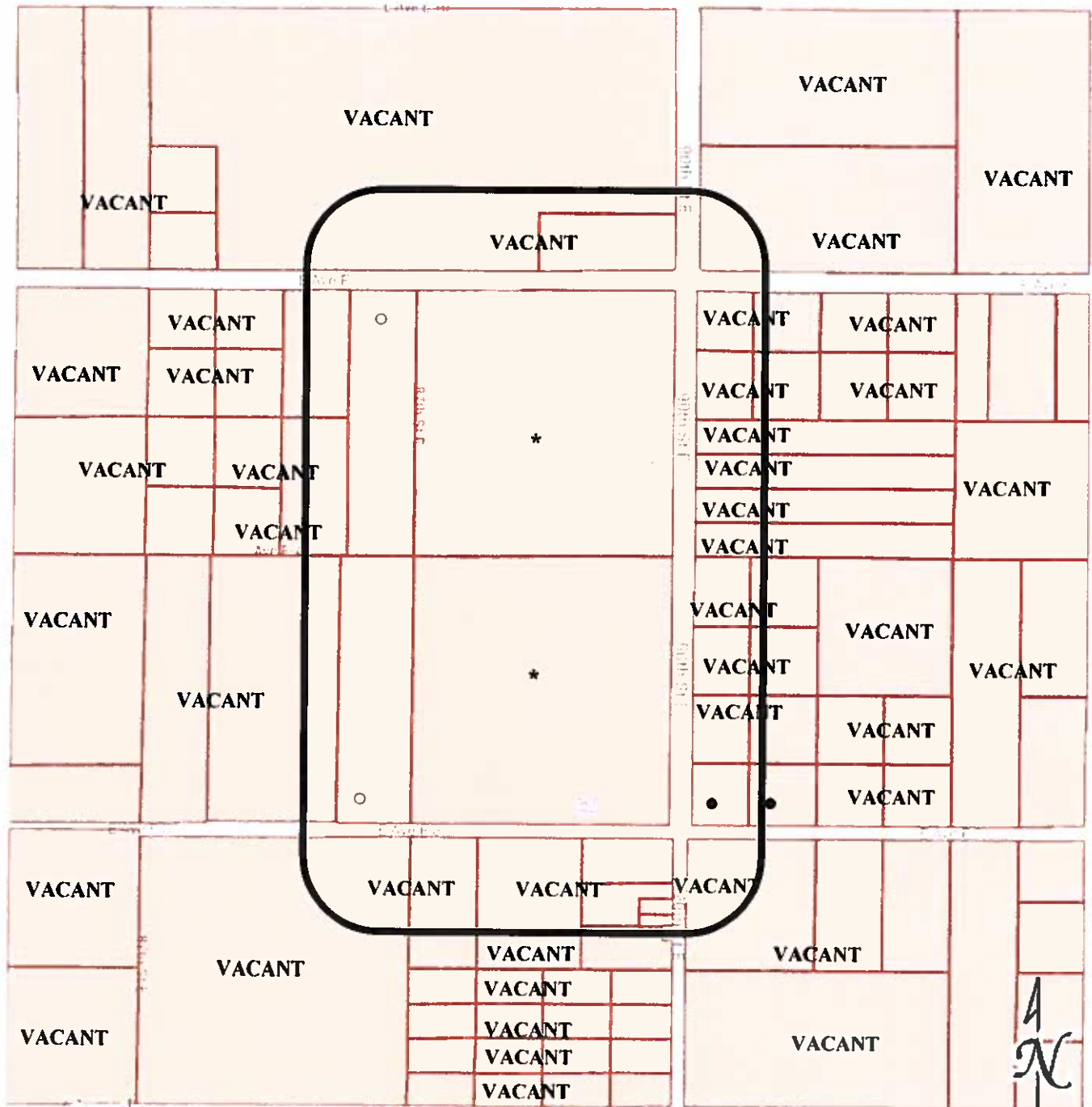


Southwest Corner of Site



FIVE HUNDRED FOOT (500') LAND USE MAP

Case No: R2013-03397-(5)



LAND USE LEGEND

- * Subject Property
- o Single Family Dwelling
- Industrial Parking Lot

All other uses: VACANT

Scale: 1" = 750'

1 LOS ANGELES COUNTY REGIONAL PLANNING DEPARTMENT
2 LOS ANGELES COUNTY REGIONAL PLANNING COMMISSION

3 -oOo-

4
5 COUNTY PROJECT NO.: R2013-03397-(5)
6 ANTELOPE VALLEY SOLAR ENERGY PROJECT
7 ANTELOPE VALLEY SOLAR, LLC

8
9 -oOo-

10
11 PUBLIC HEARING

12
13 THURSDAY, DECEMBER 11, 2014

14 5:00 P.M.

15
16 EASTSIDE ELEMENTARY SCHOOL
17 6742 EAST AVENUE H
18 LANCASTER, CALIFORNIA 93535

19
20 APPEARANCES: ROSIE O. RUIZ, STAFF
21 MARK CHILD, HEARING EXAMINER
22 PAUL MCCARTHY, STAFF
23 ANTHONY CURZI, STAFF
24 DAVID REVELT, PRESIDENT
25 ANTELOPE VALLEY SOLAR, LLC

REPORTED BY: PEGGY DOWNS, CSR NO. 11965

1 MR. CHILD: Good evening, everybody. Can everybody
2 take their seat. It's a little after 5:00. Thank you
3 for coming out.

4 Just for the record, today is December
5 11, 2014. My name is Mark Child. I will be the Hearing
6 Examiner this evening. With me from the R.P. staff is
7 Anthony Curzi, and next to me is Paul McCarthy. So if
8 you can stand please and join me in the Pledge of
9 Allegiance.

10
11 (ALL STAND FOR THE PLEDGE OF ALLEGIANCE)
12

13 MR. CHILD: Before we get started on the agenda,
14 let me just explain the format for this evening's
15 meeting. First the staff will give a presentation. You
16 see it on the screen there. We will square any of those
17 who will be speaking this evening, and then we will
18 follow with a presentation by the applicant.

19 If you need copies, there's an agenda in
20 the back of the room. We just have the one item this
21 evening, which is Project Number R2013-03397, and
22 Environmental Assessment Number is 201300290. Applicant
23 is Antelope Valley Solar, LLC. The property is located
24 at the southwest corner of 90th Street East and East
25 Avenue F. This is the Antelope Valley East Zoned

1 District.

2 The project will be to consider and the
3 purpose of today's meeting is to consider and take
4 testimony with the mitigated declarations that assesses
5 the impacts of Aesthetics, Air Quality, Biological
6 Resources, Cultural Resources, Hazards and Hazardous
7 Materials, and Utilities/Service Systems considered and
8 reduced to less than significant with mitigation
9 measures pursuant to CEQA reporting requirements.

10 The project being proposed is to
11 construct, operate, and maintain a photovoltaic solar
12 renewable energy facility in two phases, producing 7.45
13 megawatts of energy in the A-2-1 (Heavy Agricultural -
14 Once Acre Minimum Required Lot Area) Zone pursuant to
15 Section 22.24.150 of the Los Angeles County Code.

16 So next we will follow the presentation
17 by Mr. Curzi.

18
19 Slide 1:

20 MR. CURZI: Good evening, Mr. Hearing Examiner. My
21 name is Anthony Curzi with the Zoning Permits North
22 Section of the Department of Regional Planning.

23 The matter before you tonight is a
24 Hearing Examiner Hearing for a new photovoltaic solar
25 energy project located in the unincorporated community

1 of Roosevelt.

2
3 Slide 2:

4 The project is located on the southwest
5 corner of East Avenue F and 90th Street East in the
6 northeast Antelope Valley, approximately 50 miles north
7 or downtown Los Angeles. The site is zoned heavy
8 Agricultural or A-2, and the Antelope Valley Area-wide
9 Plan designation is Non-Urban 1 or N1.

10
11 Slide 3:

12 The applicant is requesting a conditional
13 use permit to authorize a maximum 7.45-megawatt
14 photovoltaic solar facility, defined as an "electric
15 generating plant" in the County Code. Electric
16 generating plants are permitted in the A-2 Zone with a
17 conditional use permit. Also requested is a
18 modification to allow a 7- to 8-foot fence in lieu of a
19 3.5-foot fence in the front yard.

20
21 Slide 4:

22 The project site is approximately 81
23 gross acres and consists of vacant land that was last
24 farmed around 1974. Surrounding land uses are comprised
25 mostly of vacant land although the Lancaster Water

1 Reclamation Plant is across the project site on East
2 Avenue F.

3
4 Slide 5:

5 The project involves the construction,
6 operation, and maintenance of a solar facility producing
7 a maximum 7.45 megawatts in two phases. The first phase
8 involves the northerly 35 to 40 acres of the site and
9 will generate 4.45 megawatts, while the second phase
10 will occupy the remaining southerly portion of the site
11 and will generate 3 megawatts.

12
13 Also proposed is landscaping along 90th Street East and
14 the northern and southern 500-foot portions of 87th
15 Street East. Appurtenant equipment and facilities, such
16 as water tanks, electrical infrastructure, fencing, and
17 internal roads will also be constructed. A connection
18 to the electrical grid will be made to Southern
19 California Edison circuits located near the eastern
20 boundary of the project site.

21
22 Slide 6:

23 The County, through an Initial Study, has
24 determined that a Mitigated Negative Declaration, or
25 MND, is the appropriate environment documentation for

1 the project. Part of the purpose of this evening's
2 hearing is to take testimony on the draft mitigated
3 negative declaration for the project, which was released
4 for public review on November 5, 2014. The close on the
5 public review will be on December 19.

6 The MND determined that impacts to the
7 following categories could be reduced to less than
8 significant with incorporation of mitigation measures:

9 Aesthetics;
10 Air Quality;
11 Biological Resources;
12 Cultural Resources;
13 Hazards and Hazardous Materials;
14 And Utilities/Service Systems.
15

16 Slide 7

17 As previously mentioned, the close of the
18 public review period on the draft MND will occur on
19 December 19, 2014. Comments received on the MND will be
20 responded to in the final MND.

21 Lastly, a hearing before the Regional Planning
22 Commission in downtown Los Angeles will occur to certify
23 or reject the final MND and to approve or deny the
24 conditional use permit.

25 This concludes my presentation.

1 MR. CHILD: Thank you.

2 So as Mr. Curzi just mentioned the
3 purpose of today's meeting is to collect comments about
4 the environment document. The comments will then be
5 forwarded on to the Regional Planning Commission and
6 will have their hearing on January 7th.

7 So next if someone intends to speak,
8 stand and we will swear you in.

9 Everyone who has filled out one of these
10 cards and you wanted to testify, go ahead and stand.
11 And you're thinking you want to testify but not sure,
12 raise your right hand.

13 Do you and each of you swear or affirm
14 under Penalty of Perjury that the testimony you may give
15 in the matter now pending before this Hearing Examiner,
16 shall be the truth, the whole truth, and nothing but the
17 truth so help you?

18
19 (ALL RESPONDED IN THE
20 AFFIRMATIVE.)

21
22 MR. CHILD: Please be seated.

23 MR. LOVE: The applicant may come up and make a
24 presentation.

25 MR. REVELT: Hi everyone, good volume in the back.

1 Thanks.

2 My name is David Revelt and I'm the
3 President of Antelope Valley Solar, LLC, which is the
4 developer of this project. Thanks for coming out on the
5 storm of the century night. I think we have one of
6 these every couple of years now. I appreciate your
7 coming out.

8 Our solar project is a photovoltaic solar
9 project. It's going to be ground mounted. The
10 photovoltaic panels are the ones that you've seen
11 before. They're the same panels that you see on
12 people's houses. They're mounted on the ground and the
13 way these work, as many of you probably know, is they
14 absorb the sunlight, and when they absorb the sunlight,
15 they generate the electricity which goes off to the
16 wires, interconnects to the So Cal Edison utility grid.
17 We sell it to So Cal Edison at the wholesale rating. So
18 Cal Edison then sells to the consumers at the retail
19 rating.

20 The big difference is this is not a solar
21 thermal project. So I know that there is a project on
22 Avenue G in Lancaster, the East Solar Project, with the
23 towers and the mirrors that reflect the light up into
24 this boiler, I think it is, that turns the generator.
25 This isn't that technology at all. These are just solar

1 panels that absorb the sunlight as opposed to reflecting
2 the sunlight.

3 This is what a standard project looks
4 like beside our project. Our project is divided into
5 two phases, as I've mentioned. The first phase is about
6 4.45 megawatts. But these are the PV panels that you
7 see.

8 The PV panels will be either mounted on
9 what is called a "fixed-tilt" which is built to just
10 stay stationary, or they'll be mounted on what is called
11 a "single-axis tracker. And a single-axis tracker just
12 follows the sunlight from east to west throughout the
13 day making one rotation throughout the day -- either one
14 of those technologies is possible.

15 This is, as you can see, is a single
16 access tracker project because the panels are tilted to
17 face the sun. I'm not sure whether if it's east or west
18 looking here.

19 This is the project location, as
20 previously mentioned. It's out on avenue F and 90th
21 Street East. We own the property. It's private
22 property. And it's surrounded for the most part by L.A.
23 County Sanitation District, which I know most of you are
24 probably familiar with there.

25 These are photos of the property, if you

1 haven't been out in that area very recently. The land
2 was last farmed in 1974. At least 40- to 50-percent of
3 the land is still devoid of any vegetation. The land
4 hasn't made it back. There's just not enough water for
5 any vegetation.

6 So the land is highly disturbed. It's
7 sort of the opposite of the pristine desert land that
8 some solar projects have been built on, and that's good
9 for us. That's one of the things that we look for in
10 terms of land is we're trying to have a project that has
11 as few impacts as possible. And so if we find land
12 that's already been impacted, that's a good spot for a
13 project rather than land that hasn't been impacted at
14 all.

15 If you see this picture over here on the far
16 right at the top, that's the northeast corner of the
17 property. Those are the Edison lines. So Cal Edison
18 has five power lines in that area. They have a 66kV
19 line. They have two 12kV lines that branch off of that
20 12kV line, and there's another line which I don't think
21 is Edison's. Actually I think it's a cable line or a
22 telephone line of some sort on the west side. And
23 that's where we're planning to interconnect the project
24 into the utility grid is at that corner where all those
25 lines are.

1 Our line that we build on our project will be
2 underground, they will be buried, but they will run up
3 and they will interconnect onto those poles at that
4 spot.

5 So talk a little about the project and how we
6 design the project with both County's assistance and
7 knowing things about other projects in the area and to
8 meet the County standards for solar projects, again,
9 based on their experience.

10 So the first thing is setbacks. The County
11 has requested and we have agreed to do dedications. And
12 the dedications are for potential road widening in the
13 future, and if it ever occurs, it's also for a slope and
14 drainage easements that would go off of those roads. So
15 we're dedicating about five acres of the land to the
16 County, which would be land that we just give to the
17 County for potential road widening at some point in the
18 future and also the slope and drainage easements off of
19 those roads.

20 In addition to the roads, we will have
21 landscaping. In addition to the landscaping, there'll
22 be 20-foot service roads around the perimeter around
23 each phase of the project. And those 20-foot surface
24 roads allow the fire trucks to go through there is one
25 of the reasons, but also serves as more of a buffer. So

1 for instance, off of 87th Street East, we're dedicating
2 42 feet to the County -- 32 for the road 87th Street
3 East, and then another 10 feet for the slope easements;
4 and there's a landscaping buffer on the north and the
5 south, another 10 feet; and then there's 20-foot service
6 road. So we're counting roughly like 70- or 80 feet
7 before you would get from what the current property
8 boundary into the first phase.

9 And we're doing that to hide the system. It's
10 to push the system away from the property boundaries and
11 to make it more palatable to the area.

12 The first phase that was mentioned is -- so
13 we've only developed the first phase. So we're getting
14 a permit for the whole property. The whole property is
15 80 acres. It makes sense that you do all the permitting
16 at once, but we only have a power purchase agreement for
17 Phase 1 at this point. At some point in the future, we
18 may have a power purchase agreement for Phase 2, but at
19 this point we only have Phase 1.

20 Phase 1 is scheduled to be constructed in
21 2015. And Phase 2, like I said, even if it occurs, it
22 will be in 2016, 2017 timeframe.

23 As I've mentioned, the land is 80 acres in
24 size. For permitting purposes, we've assumed -- because
25 you're required to assume the worst case scenario --

1 we've assumed Phase 1 would take 40 acres in the north
2 and Phase 2 will take 40 acres in the south.

3 Honestly, just looking at the person who knows
4 a lot about this industry that's just completely
5 undiagnosed, Phase 1 is going to be somewhere between
6 20- to 30 acres at most. Phase 2 would probably going
7 be closer to 15 acres, maybe 25 at most.

8 So what does that mean?

9 It means that of the 80 acres of land,
10 probably I have 50 acres of impact most would be
11 utilized for the solar facility.

12 So what does that mean, well, 50 acres will be
13 utilized?

14 What that means is if there's a 20-acre
15 project, a fence would be around the 20 acres and the
16 rest of the land would be free.

17 Now if you go inside that fence, what will you
18 see?

19 Well, the solar panels are set up in rows from
20 each other all facing the sun. And you can't have the
21 panels shade each other so there's a lot of space in
22 between the rows and panels. So it turns out that you
23 only use about 30- to 40 percent of the land is actually
24 covered by equipment.

25 So if you have a 25-acre project and you're

1 using about 30 percent of it, only 80 acres of the
2 project actually have equipment on it. More stuff is
3 surrounded in the fence, but the vast majority of it is
4 peripheral. So if you think about it, of the 80 acres
5 of land, there's really probably going to be somewhere
6 around the midrange of 12- to 20-acres of land that
7 actually have equipment on it. The rest of the land
8 will actually still remain as it is today.

9 And I go through that math, which is tedious I
10 know, for sort of an important reason. I know there may
11 be a concern that, look, the east side is going to now
12 start looking like the west side. And there's a ton of
13 solar projects on the west side there's hundreds of
14 megawatts of solar projects on the west side.

15 The reason there's hundreds of megawatts of
16 solar projects on the west side is because there's a
17 substation on J and 90th or 100th West. It's called the
18 "Antelope Substation." It's a huge substation, and it's
19 kind of like these 5kV line. They're run from the
20 Whirlwind Substation and the Windhub Substation, which
21 are both up in Kern County, and it feeds all the way
22 down into Los Angeles. That's not the situation on the
23 east side.

24 On the east side, the interconnection capacity
25 is limited by substations at Redman, the one that's on E

1 and 90th, and Highwind which is the on J and 90th. And
2 that's about 9 megawatts of interconnection capacity and
3 that's it.

4 So where the Antelope Substation on the west
5 side would probably hold 500, 700 megawatts, and you see
6 all these projects being built there, it's just not a
7 possibility on the east side. This is not -- in my
8 mind, this is not a first project magnitude. This deals
9 with a project that is kept solely on the east side --
10 (inaudible).

11 Okay, the low impact design. So as I've
12 mentioned before, they're going to be mounted on either
13 a fixed-tilt system or they're going to be on a
14 single-axis tracking. If they're a fixed-tilt system,
15 the panels won't be more than about 6 feet off the
16 ground. So this high is how high they will be
17 (indicating).

18 If they're on a tracking system, when the
19 panel is tilted in the morning or tilted in the evening,
20 it's about 8 feet high, and this is about how high it is
21 (indicating). So I guess some people have seen Acton
22 East Solar, that tower, those two towers that are there
23 that are humongous, this will be nothing like that in
24 this project.

25 I think other people may have been

1 familiar with this technology called "CPV,"
2 concentrating photovoltaic, and it's sort of kind of
3 issue. It probably stands about 16 feet in the air.
4 Nothing like that here. We're using PV technology, sort
5 of tried and true, and it's lower to the ground.

6 We'll be building a landscaping, trees on
7 the 90th Street East side of the project, and then also
8 the north and the south 87th Street East side of the
9 project. And we're building on the 87th Street because
10 there are neighbors on the 87th street side and we
11 wanted to block the view of the project from those
12 neighbors. That's the very least that we could do.

13 The trees will be irrigated by the project
14 until they take root. And that's a County condition and
15 County requirements that we'll do that.

16 Next slide, this is a simulation -- and
17 hopefully you can see it. I know it's a little bit
18 light in the back -- and this is a visual simulation
19 what the project will look like before and after with
20 the trees.

21 Site lighting, we don't expect very much site
22 lighting. The work gets done during the day. There
23 will be some site lighting for security purposes but
24 they'll be on motion detectors. They' won't be
25 sensitive enough so that animals can disturb the motion

1 detectors. All the site lighting will be pointed down
2 into the project. We have no desire to light the
3 project. It's an expense for the project that is
4 completely unnecessary.

5 Fire prevention, we're required by L.A. Fire
6 Department to have a 10,000-gallon water tank for each
7 phase of the project. And that's what we'll have. It's
8 required for all the solar projects, but it provides
9 some water for fire if it's ever needed.

10 Next one:

11 Dust minimization particularly during
12 construction -- and I know this is a really big concern.
13 It's a big concern throughout the entire county, and
14 there's now a very rigid set of requirements that is
15 sort of required to these solar projects to minimize.

16 The very first thing is there's minimal
17 grading. So there's about four things that are going to
18 be graded on the project:

19 One is the service roads that the fire trucks
20 might need to drive around on;

21 Second is there's the fuel equipment pads.
22 There's this mechanical device called a "converter" and
23 a "transformer." It takes the electricity and sends it
24 on to Edison. We will have about four of those. They
25 are about 3 feet by about 2 feet. We'll have to sort of

1 grade those areas;

2 There will be some irrigation basins required
3 by the County for hydraulic purposes;

4 And then there finally is the fire access, as
5 I've mentioned.

6 So all in all, that's about 10 percent of the
7 project site. So if there is 20 acres is Phase 1 of the
8 project, approximately two acres will be graded. The
9 rest of the land won't be graded.

10 The rest of the land will be mowed down,
11 particularly during construction, but afterwards,
12 they're pretty much will be left. It may be mowed on
13 occasion during the operation of the project if it's
14 needed. But if it's not needed, then it just won't be
15 mowed at all. What we'd really like to have the
16 vegetation come back on the site to the extent possible.

17 Dust and solar doesn't mix. They don't mix at
18 all. Every time there's dust, that dust lands on the
19 panels. The dust on the panels reduces the electricity
20 that can be produced by the whole project. I've got no
21 interest in there being dust out there. That's just
22 defeating ourselves, shooting ourselves in the foot. So
23 we're going to try to be as low impact as possible
24 during the project and also during the operations.

25 Water usage. So we want to use recycled

1 water. First let's talk about how much water because
2 I've got a feeling there's a lot water people here in
3 the audience. It's not much. So we need some water in
4 the beginning for grading to keep the dust down, and
5 that's sort of on the order of more like a 10-acre feet
6 of water that we'll need.

7 We're going to need water during the
8 operations of the project to go through and knock off
9 the dust off the panel. That's about a 5-acre feet of
10 panel that we'll need over the entire 20 years life of
11 this project. So it works to a little bit less water
12 than maybe one average household might use in a year.

13 The reason is twofold: One is the wind. The
14 wind actually has two benefits for solar. One is it
15 cools the panels, and when the panels are cool, they
16 actually operate more efficiently;

17 And two is the wind blows the dust off the
18 panels. It blows the dust on and it blows the dust off.
19 And you've got a lot of wind out there. It sort of
20 works for a couple of good reasons for solar.

21 Having said that, it is industry standard that
22 people come out and they wash the panels sometimes
23 between one and two or three times a year. Frequently
24 the washing will occur right before the summer months
25 when you have the most solar resources. There may also

1 indicate to be some kind of timing to see when the L.A.
2 County Sanitation District is going to farm. Because
3 when they farm, that's potential for dust to get into
4 the panels and we have to time for that.

5 But that's it. As I've said, really our job
6 is to knock off the dust, and the water we want to use
7 is recycled water. We don't have any desire to use
8 potable water. It's more expensive and it's needed for
9 other purposes.

10 Next.

11 Okay, this is a little bit more about the
12 project. One is the construction schedule. As I've
13 mentioned, Phase 1 is 2015 is when it's planned.
14 Phase 2 is planned for the 2016 to 2017 timeframe if it
15 ever goes forward.

16 Short construction schedule. We listed here
17 conservatively that it's going to take up to three to
18 six months. That's probably a really conservative
19 estimate. They build 20-megawatt projects now in four
20 months. So we have a 4-megawatt project. If you do the
21 math, it's not going to take that long.

22 The number of people who are on the site is
23 really going to vary. So in the beginning when we're
24 doing a little bit of grading, they may be on the site
25 for three days, maybe a week. It's not going to take

1 that long to knock it off at all.

2 At the peak of construction, the peak of
3 construction is when they're actually taking the panels
4 that are on the ground and putting them onto the rack.
5 What they do is they work in teams and they move toward
6 1-megawatt blocks, and do a megawatt and do a megawatt
7 and just keep moving around like that.

8 It's very repetitive work and they get very
9 fast at it. And when you have a very experienced team
10 on a very large project, they can be doing several
11 megawatts a day. So I would imagine at the peak of
12 construction, we may have 20 people on the site, and
13 they'll probably be on the site for a couple of weeks at
14 most.

15 These projects are easier to build than a
16 house. They will go up very quickly and there's very
17 few moving parts and it's very standardized and it just
18 moves fairly quickly.

19 Operations. The sites are going to be
20 monitored remotely. So they connect to the Internet,
21 and there's someone who watches the site over the
22 Internet and sees how it's doing. And as long as the
23 productivity is sort of within their models that they
24 run, it's doing fine.

25 Then they come out to the site usually at the

1 same time they do the panel washing, which may be once
2 or twice a year, to check on things, electrical things,
3 do some warranty work, and that's usually really about
4 it. So the amount of traffic that's going to be
5 occurring on the site during throughout the entire life
6 of the operations is going to be minimal, so not too
7 many people.

8 The analogy I like to tell people is it's
9 going go like a substation. The utility come out to the
10 substation not more than a couple times a year because
11 they just sort of work on them.

12 When the people do come out, they do come out
13 for a panel cleaning because, as I've said, it depends
14 on the weather for that year. There's no heavy
15 equipment when they come out. They don't make any noise
16 unless you're very, very close, you won't be able to
17 hear them at all. If it's on a single-axis tracker and
18 you're standing right next to it, you're going to hear
19 the little click sometimes when the motor is moving the
20 panels from east to west. If they're fixed-tilt, you
21 won't hear that at all.

22 No noise. No hazardous materials. No
23 pesticides. No pollution. That's what these projects
24 provide and that's how they operate.

25 What does it provide in terms of energy?

1 So a project that's 4.5 megawatts will provide
2 roughly enough energy for 2,000 homes. And it's a green
3 energy. It's replacing coal. It's replacing natural
4 gas energy that So Cal would have otherwise bought.

5 And it's local energy for the community. We
6 are in this business because we believe in protecting
7 the environment. That's what got me into this business.
8 And what one of the things that we try to do is try to
9 think of look at energy in the future as like sort of a
10 farmers market and where you're buying your local energy
11 slowly produced and it's not being imported from like a
12 coal mine in West Virginia.

13 We'd like to utilize the existing utility
14 system. So we designed this project so that there's not
15 utility upgrades. One because those upgrades are very
16 expensive;

17 But two, the idea is we would just slip into
18 the existing system, not have to build new transmission
19 lines, not have to build new substations, which cause a
20 lot of problems for the project and also is an eyesore
21 for the community.

22 We'll have construction jobs during each phase
23 of the project. In connection with the project, we're
24 making a donation to a nonprofit that preserves
25 Burrowing Owl and other similar animals as one of

1 biological mitigation measures.

2 And when those phases of the projects go
3 forward, we'll have over a million dollars in tax
4 revenues just through the equipment we bought, the
5 animals the birds, the transformers that will flow into
6 the County and come back to here. That's another factor
7 the project provides.

8 This is my contact information. I'm from
9 a small town of a thousand people, so when I moved to
10 Los Angeles -- it's probably a thousand people who lived
11 in my apartment building when I first got here. So I
12 understand that folks out here live in a small town. I
13 understand it's very remote and I appreciate that a
14 great deal. So you should feel free to reach out to me.
15 Whether you want to talk tonight or don't want to talk
16 tonight, that's perfectly fine.

17 But if you have questions about the
18 project, if there's something you think we can do a
19 little bit better, if the project goes forward and
20 there's a problem -- there's too much dust or
21 something -- I encourage you to contact me and reach out
22 to me because we do want to be good neighbors. We think
23 it's our obligation, and that's how we want to proceed.

24 MR. CHILD: Thank you. Now we move to public.
25 Anyone from the public who wants to come up and speak?

1 Paul, do you want to read off the list?

2 MR. McCARTHY: Okay, the first pick will be Joseph
3 Ginn, G-I-N-N.

4 A I'm passing.

5 MR. McCARTHY: You're passing, okay.

6 The next speaker is Myrle McLernon,
7 M-C-L-E-R-N-O-N.

8 MR. McLERNON: Good evening. Myrle McLernon for
9 the Roosevelt County Council. I live at 85th East and
10 Avenue K.

11 A few concerns from the town council. First
12 one more directed at the planner, Anthony.

13 The project has a 2013 number, and initial
14 notification to the neighbor was on the 28th of
15 February, but we didn't find out about this until the
16 7th of November. It would be good if we were included
17 earlier in this process, we'd appreciate that. We're
18 supposed to be, and that's a technical thing. We like
19 to do that on all projects with the County. So let's
20 address this presentation up there.

21 Eight-foot fence. Is this fence going to be
22 screened or is it transparent, if you know?

23 MR. CURZI: On F, it would be transparent. It has
24 no landscape at this time on would be considered front
25 yard towards F.

1 MR. McLERNON: And why are we not landscaping all
2 the way around?

3 MR. CURZI: We're open to suggestions. I think
4 environmental determination was that the surrounding
5 land use is that it wasn't needed at that particular
6 location.

7 Like I said, we're always open to
8 suggestions.

9 MR. McLERNON: It just seems like we're doing a
10 three-quarters the way around, kind of missing the boat
11 there.

12 The landscaping itself, we saw the
13 picture of a row of trees and then a comment that they
14 would be watered until they took root. If you did that
15 five years ago, they'd be twigs right now because of our
16 drought. So we want to make sure there's something in
17 place to make sure that doesn't happen.

18 Does the site, it actually have its own
19 water, or is it going to all be imported?

20 MR. CHILD: This site does not have a well or
21 anything like that. It would come from a number of
22 sources and most likely be recycled water so it would be
23 imported.

24 MR. McLERNON: Okay. Is it directly piped or is it
25 just trucked in?

1 MR. CHILD: I can't recall in that it would be
2 completely piped.

3 MR. McLERNON: I notice the pipe system in the
4 area. The reason I'm asking is because it comes back to
5 the landscape and maintenance and stuff like that.
6 Partly water and landscaping, you really need to be
7 consistent. You don't need to be a lot if you pick the
8 right tree, but it needs to be consistent.

9 You show the trees in that landscaping.
10 Is there any additional landscaping other than the trees
11 planted?

12 MR. CHILD: That was a visual simulation that was
13 more of a conceptual illustration. We're open to any
14 kind of suggestions.

15 I know we've had internal discussions of
16 within the department what plants would be appropriate,
17 draught tolerant, ameliorative. We've gone in circles a
18 lot of times about this. So any suggestions that you
19 think would be good.

20 MR. McLERNON: In light of our water shortage, it
21 may make sense if that were administered, we just see a
22 couple different types of sage out there and that's it.

23 And some flowers in the fall, some
24 flowers in the spring sometimes when it gets glaring out
25 planted throughout the trees and that's all. If you

1 were to plant those and encourage them to grow, you
2 could water them over a period of a few years, and they
3 probably would resist the drought to some amount. You
4 would probably have to work on it a little bit, but it
5 would create that landscape buffer that would be a
6 little more palatable.

7 This lot, the A-2-1 Zone, if I were to
8 build a house on it, is there a lot coverage ratio for
9 that? I think there's 40 percent or something like
10 that.

11 MR. CHILD: I'm not sure about no lot coverage.

12 MR. McLERNON: Okay. If I were east a little bit
13 in a sensitive ecological area, there would be, right?
14 But this is not in that zone, correct?

15 MR. CHILD: It is not in that zone.

16 MR. McLERNON: And you mentioned before that this
17 land was previously farmed so it's just compacted.

18 So our concerns now are the mitigation
19 measures and enforcement of those over time. How does
20 the County handle a project like this if there's a dust
21 complaint or something isn't done about it. How is that
22 handled?

23 MR. CHILD: We have a Zoning Enforcement Section
24 that enforces both the project conditions and the
25 mitigation measures.

1 So with dust or any other condition or
2 mitigation measure, you could reach out to The
3 Department and we'll respond to any complaints.

4 MR. McLERNON: Okay. Your response in most
5 development cases as far as illegal construction and
6 everything is glacially slow. It's usually a 60- or
7 90-day notice and 30-day this and a 45-day that and then
8 you finally start fining people.

9 When we have a dust problem, it's usually
10 instantaneous. So I would suggest some sort of way to
11 set up an instant system to work with. The owner, that
12 he has something in place to be able to handle that
13 right away. Because when we have a dust problem, we
14 need to go fill up some water trucks and be done with
15 it.

16 Zoning Enforcement, I'm not sure it's set
17 up to do that yet, instantaneous to react. What they're
18 really getting and what they're doing takes time, and my
19 profession as an architect, I get the other end of that
20 a lot.

21 I notice there was donation to an
22 organization to preserve Burrowing Owls and stuff like
23 that. Was that a post-mediation preservation measure by
24 the owner?

25 MR. CHILD: It was proposed by our biologist, and

1 the applicant has agreed to that mitigation measure.

2 MR. McLERNON: Okay. And who is that person, who
3 selected that? Is that just somebody who is on a list
4 that qualify as nonprofits?

5 MR. CHILD: I can't remember the name of the
6 organization, but it's one that has a history of
7 protecting Burrowing Owls in the valley. I'm sorry, I
8 don't know who.

9 MR. McLERNON: Okay. What I'm really concerned
10 about is the money is being tossed at somebody who
11 claims to be an expert. And if we're going to give
12 mitigation measures, let's make sure they work.

13 You mentioned the panels were 6- to
14 8 feet high depending on the system that's used. If the
15 trees are mature, I assume it screens all the way
16 around. Is that intent, to create a visual, not a solid
17 barrier, but pretty close?

18 MR. CHILD: Yeah, the intent of the landscaping is
19 sort of to naturalize and soften, not necessarily to
20 fully screen it 100 percent. As you know, the type of
21 the foliage, vegetation that grows and the water
22 situation will take a long time and stuff like that.

23 MR. McLERNON: What I don't want to see is what I
24 see down going south and there's a couple of projects I
25 believe that are in the City of Palmdale. It's a chain

1 link box and a bunch of panels, that's it. Nothing, no
2 buffer. No landscaping, no screening. And if you're
3 going to do ugly, they did it. So I think we're headed
4 in the right direction with what we're doing.

5 MR. CHILD: You mentioned the Burrowing Owl
6 organization. The place to look in the mitigated
7 declaration is page 51. On that page it describes what
8 the purpose the mitigation would be. It doesn't
9 identify a particular organization. But it explains
10 what the purpose would be, why mitigation should be
11 paid, and to what kind of organization. It does specify
12 one.

13 MR. McLERNON: Okay. And I don't know that the
14 Burrowing Owl should be focused on solely either.

15 MR. CURZI: No. There are a list of other species
16 in there too.

17 MR. McLERNON: There are badgers, and bobcats, and
18 desert fox and everything in stereo. I've seen them
19 myself. You wouldn't think so but they're there.

20 MR. CURZI: You mentioned the --

21 MR. McLERNON: You mentioned the badgers?

22 MR. CHILD: The badgers? No.

23 THE WITNESS: They're living out behind the farms.
24 There's a whole pack living out there. They won't mind
25 unless they're --

1 Anyway, as long as they're aware, we
2 don't want to focus on just one particular type of
3 critter, we're fine.

4 That sums up our concerns as a town
5 council. There may be individuals that have some
6 specific concerns and our environmental experts have
7 some general things. We would like to have had this
8 conversation six months ago. That's okay, we're having
9 it now.

10 Thank you.

11 MR. McCARTHY: The next speaker will be Richard
12 Wood, and that is W-O-O-D.

13 MR. WOOD: That is correct, W-O-O-D. I am
14 singular, not plural. Many people like to add an "S" to
15 it.

16 I live at 45763 90th Street East, which
17 puts me approximately two and a quarter miles south of
18 the site. Not that that's important but just so you
19 understand where I come from.

20 I'll take the easy one first. I really
21 would like to know who this nonprofit organization is
22 that's going to be doing whatever they're doing. So
23 when and how can we find out who they are?

24 MR. CHILD: That information will be available when
25 the staff report comes out. I can probably get it to

1 you sooner though.

2 MR. WOOD: Okay. Now, I understand that the plan
3 is to use recycled water. I really want to be sure that
4 that's going to be the case in perpetuity.

5 You folks are well aware we're up to our
6 ears in ground water communication, which I'm very much
7 into. And every landowner has tentatively been
8 allocated an amount of ground water or ground water
9 pumper. So if somebody ends up using ground water
10 instead of District 14's recycled water, whose
11 allocation would that come out of?

12 You may not see that as an issue now and
13 there may never be an issue, but that's something that
14 has to be considered.

15 Another issue which I'm sure you're aware
16 of that's come up on both the west side in both
17 Lancaster and the unincorporated areas is the cumulative
18 effects of all of these solar farms. And basically the
19 people on the west side, who I also work with, have been
20 told, well, they're just not significant.

21 Well, who knows, 20 years from now when
22 we get how many more of these things have significant
23 that would be. To the best of my knowledge, nobody as
24 investigated the cumulative effects of many more of
25 these showing up over several decades.

1 And finally the visual screening. In my
2 personal opinion, what has happened on the west side, to
3 put it politely, is totally inadequate. It doesn't seem
4 to be happening very fast and some of it I think is
5 underrated and they have done nothing at all.

6 I'm of the opinion it should be the
7 vegetation should provide a solid screen and you cannot
8 see through it. The pictures you show of those trees we
9 saw in the picture is totally inadequate.

10 Something else that could be used are one
11 of the bamboos that survive well in the desert and they
12 grow very quickly. You see them around some houses.
13 You don't see those stands that's used for this. But it
14 does provide a very solid visual screen, and it's quite
15 tall. So when someone is driving down the road, they
16 wouldn't have a clue something was there. If you use
17 something like that. What' I'm saying is a number of
18 trees spaced out doesn't really cover the project well
19 at all.

20 Now, I have another opinion, which I know
21 the project probably is not going to like, but because
22 of experiences some of us have had playing around local
23 politics here for decades, often times people say
24 they're going to put up some visual mitigation and it
25 never happens and it's never enforced.

1 What I think should be done is that
2 visual screen, whatever trans-vegetation is used, should
3 be in place before you start construction. I know
4 proponents are not going to like that. But you see just
5 too many of these things where vegetation never appears
6 or it's allowed to die and it's never enforced by the
7 County to ensure that it stays in force.

8 Those are my concerns and comments.
9 Thank you.

10 MR. McCARTHY: The next speaker will be Jim Nye,
11 N-Y-E.

12 MR. NYE: Good evening, thank you.

13 My name is Jim Nye. I live at 8690 East
14 Avenue F. I am the direct neighbor to the project.

15 Most of my concerns and questions have
16 already been addressed, but one thing I did want to ask
17 is the project is divided into two separate projects, 40
18 and 40 is basically the way it's laid out in simple
19 terms.

20 My question would be is there a reason
21 why the north portion is being developed before the
22 south portion.

23 And I don't know if there's an answer to
24 that question. If it's a proximity issue with the power
25 lines or what that may be. But if we're dealing with

1 equal parcels, and I'm going to be selfish that the
2 north part is right next to my fence -- well, not next
3 to, it's been explained to me how far away -- but it's
4 directly east of it.

5 It's also been indicate that, not
6 necessarily doubts, but there's no guarantee that the
7 second phase of the project is going to be built.

8 So if they're going to build the first
9 phase with no guarantee of the second phase being built,
10 is there a reason why it can't be built on the south end
11 first?

12 Everything else has pretty much been
13 addressed, other than I have a question also about the
14 perimeter planting situation.

15 I've discussed with the developer before
16 about the trees. We have trees on our property and
17 keeping them alive is a major, major issue. It takes a
18 lot of water.

19 And I understand they're going to use the
20 Sanitation District water, which is great, but with the
21 sanitation District water being tertiary treated water
22 and the city is doing everything they can to get that
23 water, some day it appears that that tertiary water may
24 not be available for agriculture. So if it's not
25 available for agricultural, it doesn't seem that it can

1 be available for land use.

2 I assume they're using it because it's
3 not potable water, which is good. I'm glad they've
4 decided not to do that. But when the proximity to that
5 water becomes not available, I don't know what they're
6 going to do.

7 So a lot of people have suggested in
8 keeping any kind of vegetation alive will be an issue
9 because I know it is for me.

10 That's really all I have. I did suggest
11 at one time when I talked to the project developer about
12 shading as opposed to trees. And I know a lot of people
13 like to see natural trees and vegetation and all that
14 good stuff. But if they're trying to hide the project,
15 shading on the perimeter fencing might be something you
16 want to consider.

17 That's it. Thank you.

18 MR. CURZI: I'm sorry, what now? Shading, you
19 mentioned?

20 MR. NYE: Shading. In other words, they shade the
21 fence so you can't see inside the property.

22 MR. CURZI: I see.

23 MR. CHILD: The question about why the north first.
24 You know that or is that -- generally these meetings we
25 collect the information and we discuss. Anyone on the

1 Commission, does that seem like something you might be
2 able to answer tonight so at least walk away with that
3 answer.

4 MR. REVELT: David Revelt.

5 It has to do with the interconnection,
6 Jim. And you're right, it's the proximity to the
7 substation that makes the interconnection easier. So
8 that jumble of wires that was in that one picture on the
9 northeast side, being able to interconnect there is much
10 easier because it's closer to the substation. That's
11 one reason.

12 The second reason is that there's a FEMA
13 flood zone, which is sort of a technicality now on the
14 east side. I really don't think that -- 90th Street
15 East acts as a barrier. The vast majority of the
16 flooding is on the east side.

17 If you look at sort of what the FEMA map
18 is, that flood zone area is much larger to the south.
19 So we're going to be able to push the project further
20 towards 90th Street East on the north side than we are
21 on the south side. And that's what we wanted to do for
22 both the interconnection purposes and move it away as
23 far east as far as we could. So that's why it was the
24 north side.

25 Unfortunately, it is not like a movable

1 project. Like you have to tell Edison exactly where the
2 thing is going to be built and you can't adjust it. So
3 I'm sorry about that, but that's the reason.

4 MR. NYE: Can I ask a question about his statement?

5 MR. CHILD: Go ahead.

6 MR. NYE: Okay. When and if the south is
7 developed, will it utilize the same equipment that has
8 already been built in the north?

9 MR. REVELT: No. It will be completely separate
10 equipment and it will be a completely separate point of
11 interconnection into the Edison grid. It can't utilize
12 the same.

13 Because within the Edison contract, the
14 contract will be considered a completely separate
15 project, maintained separately, just treated as if it
16 were several miles away. It's completely different. So
17 it will be nothing cross-utilized.

18 The project in the south will be a little
19 bit smaller. So you've got 3 megawatts at the most.
20 And so there's less usable land in the south due to that
21 flood zone. And that's another reason that the smaller
22 project will have to go to the south. It will be
23 completely separate equipment.

24 While I'm here, if possible, that this
25 conservation group -- this conservation group is called

1 "Habitat Conservation" -- I forget what their name is
2 off the top of my head, but I think I've got it in my
3 computer. You can ask for it afterwards.

4 They own a slew of land out in the west
5 side up near the Kern County border. And they actually
6 own some land down in Pinon Hills in that area -- I'm
7 sorry I don't remember their name. They buy land. They
8 but land that's great conservation land.

9 So the story behind it is this is we've
10 done a number of biological surveys on property. We
11 look for the American badger on the property. They put
12 a night camera out there to see what's going on there at
13 night and pictures of that all of that stuff while we
14 sleep at night.

15 So we did all of that and we found one
16 thickened burrow wing owl. Our biologist is like, look,
17 it really shouldn't be here, this owl must of lost its
18 way because this is not good land for a Burrowing Owl to
19 be on, above the incline.

20 So when we were talking to the County
21 biologist, when we were talking to our biologist, he
22 said, look, your land is not good for Burrowing Owl
23 burrows. So having you to mitigate some of your land
24 doesn't make any sense.

25 But there's these groups out here that

1 have other land that's being tasked for Burrowing Owl.
2 They can support a lot of Burrowing Owl, but they need
3 some money. So that was sort of how the compromise
4 worked. It is going to a real nonprofit that's truly
5 dedicated to preserving. It's not just Burrowing Owl,
6 but they also have opossum land and a lot of other prey.
7 And the ideal was we could do far much more good for
8 these species by helping them with their land than doing
9 anything on our land.

10 MR. CHILD: Thank you.

11 Mr. Nye, did I understand you correctly
12 you would be the most affected neighbor from this
13 project?

14 MR. NYE: Yes.

15 MR. CHILD: That you would be open to a screened
16 fence rather than the vegetated barrier?

17 MR. NYE: I'm just concerned about keeping the
18 trees alive.

19 MR. CHILD: That's important. I understand that
20 can be an issue.

21 MR. NYE: And the trees are going to grow, I just
22 have my doubts.

23 There's a project on the east side on
24 20th Street West and Avenue M, and you know there's a
25 fence there and you know there's a screen there, but you

1 don't know there's solar there. And with the trees, if
2 solar is not what you want to look at, the trees are
3 never going to stop from that.

4 And I spoke with a developer before and
5 there's an issue. And I don't know -- as he explained
6 it to me, is the distance between the fence and the
7 first panel, whether it didn't matter, but there's an
8 issue in blocking the sun. You don't want the sun
9 blocked. What you're trying to do is gather the sun.
10 So a lot of times is the panels are close to the fence,
11 you're going to screen the access to the sun to the
12 fence.

13 I can't remember whether that was an
14 issue on the screening. So I don't know if it was a
15 financial issue or a project issue with producing the
16 power amps.

17 But yeah, I've spoke to Mr. Revelt
18 before. He's been very helpful. He's been cordial to
19 me and let me know everything about what is going on,
20 but I've always had a concern about these trees. We
21 work really hard out here in the desert to keep our
22 trees alive.

23 And as one of the speakers before said,
24 it's not just solar projects, but you can drive a lot of
25 places where people have put up trees for wind blocks or

1 different purposes and they're all dead and when they
2 can no longer water them.

3 And someone mentioned if there's a
4 problem or a complaint, can you call planning and
5 complain, well, are we supposed to call you when trees
6 die? I don't know if that's what you deal with is a
7 dead tree. But -- okay.

8 MR. CHILD: Thank you very much.

9 MR. NYE: That's it for me.

10 My only other issue was going along with
11 what Merle said is that we've had a lot of real town
12 council meetings and we've always talked about how
13 anything that happens within the community needs to be
14 discussed with the Town Council before it happens, and
15 this basically happened after. As far as I know, we
16 really still haven't had a real town council meeting
17 addressing this issue.

18 This is the first notification. And
19 correct me if I'm wrong, the requirements for a thousand
20 feet of location projects. And as far as I know, only
21 three people have gotten notices and I'm one of them.

22 One of them is a -- he's not an owner.
23 He just lives there. And whether the dairy got notice
24 or not, I don't know. Their property is within a
25 thousand feet, but nobody else knew. I knew I was

1 notified. But it would be nice if the community at
2 least know what's going on before it gets to this point,
3 because I understand how much work has gone into this.

4 Mr. Revelt gave me all the documents.
5 They're about that thick (indicating), and by the time
6 all of that stuff is done, you need to find a fault in
7 the declaration -- or you need to find something wrong.
8 And I've looked through it and there does not appear to
9 be anything wrong. They did their geology. They did --
10 everything they did. And here we are in the comment
11 section, which is good, but it would be nice if the
12 community knew what was going on before it got to this
13 point.

14 We had a presentation from I believe it was
15 Verizon a couple years ago about a cell tower they were
16 going to put up. I don't know what stage they were at
17 in their planning, but they spoke to the town council.
18 They let everybody know what was going on. So it would
19 be nice if they directly got a notification.

20 That's all I have. Okay, thank you.

21 MR. CHILD: Our first speaker was part of the town
22 council; is that correct?

23 MR. McLERNON: Yes.

24 MR. CHILD: Can we just ask you when your next
25 scheduled meeting is so somebody from Antelope Valley

1 Solar or Mr. Revelt would be able to come and give a
2 presentation?

3 MR. McLERNON: Ron, do you want to answer that?

4 MR. FERRELL: I'm Ron Ferrell. I'm vice-president
5 of the town council.

6 We don't schedule meetings unless we know
7 ahead of time on something. That's one of the things.
8 Martha was going to be here to speak today.

9 We never hear until the last minute. We
10 have never -- it's like Antonovich also, we don't get
11 notification and we're upset about it. We don't like
12 it. I'd like to have a copy of this tonight so that
13 Barbara and I can have a meeting and sit down. All you
14 have to do is get ahold of us and we'll have a town
15 council meeting.

16 We don't have no paper out here to notify
17 people so it's all word of mouth, and it's hard to get a
18 lot of the people together and we don't do it until
19 something important is going on. And we didn't hear
20 about this until the last minute.

21 MR. CHILD: Perhaps i think at this stage, if you
22 can call a meeting on short notice, would maybe the
23 applicant can -- what we can do is have some sort of
24 meeting before the Regional Planning Commission?

25 MR. FERRELL: What time is your meeting?

1 MR. CHILD: Our meeting is scheduled for
2 January 7th.

3 MR. FERRELL: I don't think -- as soon as we could
4 get the latter part of January.

5 See, this is the same thing that happened
6 with the Sanitation District. They came up here. I
7 found about it, that they wanted to put the flood plan
8 in. My brother, they wanted to buy his land right here
9 in this vicinity. And I wrote a ten-page
10 letter saying-- a ten-point letter to Mike Antonovich,
11 the supervisor. And that letter whatever reason asked
12 what does it take and that's what started the town
13 council, and it took us a quite a while to get started,
14 because no one wants to have the city to come out here
15 and do the same thing that the whole Sanitation District
16 land. And they went right down to having a meeting that
17 they were going to do the voting and everything on, and
18 three days before it happened, they called us.

19 And we said, no. Well, I put a squelch
20 to it.

21 They wanted to switch the land one time,
22 the same thing. They got down to three days, we didn't
23 hear about it. If they would have got ahold of us to
24 start with, it would have gone a lot easier than it's
25 going. I'm a little tired of people coming out here and

1 destroying this property.

2 I was born right down the street right
3 down here. So I was born on that land. I'm not there
4 right now. But they had homesteaded it in 1885, farmers
5 still farming that same piece of land. Well, we don't
6 like to be shoved off our property. And we don't like
7 these things coming in here. We've got a town council
8 to represent this area and nobody uses it.

9 MR. CHILD: This discussion is a little bit beyond
10 what the hearing examiner meeting, but I think it's
11 worth saying because there is time between now and the
12 hearing for -- I think if we can talk with the
13 applicant, we can see what's possible.

14 I think it's important that the town
15 council be able to review its opportunity for this
16 project to be discussed and for any solutions or things
17 that are of concern to be brought up. So if we can lead
18 it from this meeting, the staff will be review with the
19 applicant to see what options might be available.

20 And the meeting is scheduled for the
21 Regional Planning Commission has been scheduled for
22 January 7th. Because that notice has gone out, then
23 there will be a hearing. I don't want to say much more
24 than that there has to be something on the agenda for
25 that date. What is organized by the staff, review other

1 options, but that does still need to go ahead.

2 The purpose today was to just get comments and
3 have those passed along, and also on the environmental
4 document. We've done that. But I think, like you say,
5 it's worth it to us to see what we can do to make the
6 project go a little bit quicker when it gets to the
7 Regional Planning Commission. So that they understand
8 what the issues are.

9 So it's probably for everybody's benefit that
10 as much that can be discussed and presented to the
11 planning commission ahead of time is worth for us to
12 look into, and for the applicant too, I think, to listen
13 and look into it to go smoothly.

14 MR. FERRELL: Is it possible to get a copy of this,
15 and how soon can we get it?

16 MR. CURZI: Let me just respond to you.

17 As indicated, the public hearing is
18 January 7, 2015. At the staff level, we can go down to
19 the planning commission and say, we are requesting a
20 continuance until you folks have had an opportunity to
21 talk. It would be very helpful if we could go down to
22 the planning commission on that date and then say an
23 appointment had been made to have the town council
24 review the matter with the applicant on such and such a
25 date, and then we can continue to a date certain.

1 That's better for everybody. It's on the
2 web. The hearing is broadcast on the web. We can put
3 out a date certain at that time.

4 So you and the applicant have to come
5 together between now and then and give us the date that
6 you're going to meet and then we can come up with a
7 continuation date and what we call a "leeway date as a
8 date certain."

9 MR. FERRELL: Like I'm saying, is there a chance to
10 get a copy of this so tomorrow can we have a quick
11 meeting of our town council people to go over this?

12 MR. MCCARTHY: You mean the transcript?

13 MR. CHILD: All of the video and audio portion of
14 this meeting will be made available on our web page and
15 should be up by Tuesday next week.

16 You will get notes too but those take a
17 little bit longer to have access to that. I understand
18 it does take time to get it redone, so that's no
19 problem. There is some stuff that needs to happen
20 before we can post them on the web, but early next week
21 we plan to do that.

22 MR. McLERNON: I think right now the January 7th
23 meeting was continued to approve or disprove the
24 project, right?

25 MR. MCCARTHY: Correct.

1 MR. McLERNON: I'm trying to find out if there's a
2 logical way out of not continuing it, because as an
3 architect, I hate that. But the reality is we would
4 have liked to have known about it. And may be there's
5 nothing wrong with it, but may be some other opinions,
6 we don't know what they are.

7 MR. CHILD: Those don't really need to be decided
8 here tonight. I think the important this is you can
9 speak with the applicant maybe so he can keep the staff
10 informed of what is going on. And if something is
11 possible for you to work out amongst yourselves, then
12 you can report that to us. Then we go to the planning
13 commission, we can follow whatever we have at that
14 point.

15 MR. FERRELL: Great.

16 MR. McLERNON: Okay, that works.

17 MR. CHILD: So I think that concludes all of the
18 speaker cards. So could we get you to fill out the
19 speaker card?

20 MR. MCCARTHY: The gentleman in the green hat just
21 raised his hand. He had his card in earlier.

22 Ginn? Did you want to speak at this
23 time?

24 MR. GINN: I have something to say about the
25 environmental side of it consistent with this.

1 MR. McCARTHY: Can you come up, please?

2 MR. GINN: My name is Joseph Ginn. I live about a
3 mile down the street here to the east.

4 I don't know, who in the world is in
5 charge of that landscape being visual and all of that?
6 But they are so far off the mark. Nothing will ever
7 grow. You guys want to use water for what, a week and a
8 half, grow something that will last forever, it ain't
9 going to happen out here.

10 The only things that grow here are native
11 that will shield that completely from view takes 40
12 years to grow and so much water used to grow a million
13 dollars worth of alfalfa with the same water. So short
14 of an 8-foot block wall or a shielded chain link fence
15 that you're requesting, you can put that landscaping
16 right out of the window.

17 Between me and my house, you can see
18 every bit of it from the Locust trees to the Chitum tree
19 that will only do that here, and both of them require
20 incredible amounts of water that we don't have, so they
21 say.

22 Good.

23 MR. CHILD: Okay.

24 MR. McCARTHY: Another volunteer?

25 Thank you. One in the back? Did you

1 fill out your card before you leave? Just go ahead and
2 if you will give us your full name.

3 MR. VAN DAM: Gary Van Dam, V-A-N, D-A-M.

4 Are you guys aware there's a dairy farm
5 just east of the project?

6 MR. CHILD: No, I was not aware of that. How far
7 away is it?

8 MR. VAN DAM: Approximately a quarter mile. You
9 all might want to go out there and look at it.

10 MR. CHILD: Also, if you can remember this
11 information you're giving us will be passed on to the
12 planning commission, so if you can explain some
13 development, that will be easier for the transcript.

14 MR. VAN DAM: I just have some concern with the
15 dust, quite a few concerns actually. One big one is
16 what do you do after 20 years is up?

17 MR. CHILD: In other words, the life of the permit?
18 Is that what you're talking about?

19 MR. VAN DAM: Hmm-hmm, then what?

20 MR. CURZI: These are permitted for what they have
21 their contract for 20 years. After that time, the
22 permit granted of the conditional use permit, they have
23 to come in for reauthorization if the applicant wishes
24 to continue that land use. We do that with pretty much
25 all of the conditional use permits granting term which

1 allows us to come back at a future time.

2 Now, in twenty years who knows? Maybe
3 that technology will be obsolete, in which case we will
4 require a decommissions plan that in case the applicant
5 doesn't want to continue after 20 years, then the
6 decommissioning plan will have to spell out that the
7 project site will have to be restored to its condition
8 as it was before.

9 MR. VAN DAM: Okay, and that will be in the draft?

10 MR. CURZI: Yes, that will be in the condition of
11 the approval that we've done that with all of our solar
12 projects.

13 MR. CHILD: So Mr. Curzi, for the audience do you
14 have the date that the draft report for the January 7th
15 report will be expected out?

16 MR. CURZI: Let me look at my calendar.

17 I know it's usually two weeks before, but
18 that Thursday is Christmas Eve, so I think it's
19 December 22nd.

20 MR. CHILD: So normally at that stage we would have
21 a staff report. It will include with a recommendation,
22 and it also has conditions that we would attach to the
23 permit. And those conditions spell out things like the
24 decommissioning, how it might with the plan, and those
25 sorts of things.

1 MR. VAN DAM: And you guys are going to have water
2 trucks out there for dust control? How are you going to
3 do that? Where is the water coming from and how is the
4 dust control planned?

5 MR. CURZI: Most likely the water would come from
6 the Sanitation District.

7 MR. VAN DAM: Has that not been completed yet?

8 MR. CURZI: We're looking at different options. It
9 would be recycled water most likely and be trucked in.
10 And the trucks would -- when we're done with other solar
11 projects, apply water to the ground during grading,
12 during other dust generating activities. We actually
13 had conditions in the permits that say you have to water
14 two or three times daily. You have to water if the wind
15 pushes past a certain speed.

16 So we also consult with the Air Quality
17 Management District out here. We have to evaluate with
18 Air Quality Management District and they've given us
19 some recommendations to use for dust control.

20 Usually we're the keeping the grading
21 down to a minimum, watering on an as-needed basis.
22 Those measures usually help a lot we've noticed.

23 In the past there have been experiences
24 with a lot of dust being generated because they did too
25 much grading. And we've taken a different approach with

1 future projects. We've said you need to minimize
2 grading, you can mow, keep the vegetation. If you mow,
3 it if you have to, but don't tear up the earth.

4 MR. VAN DAM: Absolutely. I would be in favor for
5 not opening that south second phase. I don't know what
6 your plans are for that.

7 MR. CURZI: The project is looking at the entire
8 project worst case scenario, number one, whether or not
9 the applicant does the second phase or not, that's a
10 business decision that's beyond our purview.

11 MR. VAN DAM: I understand that, but what my issues
12 are is the dust control, being that I'm just east of you
13 guys. You know what way the wind blows out here?

14 MR. CURZI: I'm guessing west to east?

15 MR. VAN DAM: Anybody live out here? Where are you
16 guys from?

17 MR. CHILD: Los Angeles.

18 MR. VAN DAM: Nobody has been in the Antelope
19 Valley for any significant amount of time?

20 MR. CHILD: I believe we've all spent a good amount
21 of time out here given the project.

22 MR. VAN DAM: Have you spent the night out here?

23 MR. CURZI: I was here on site yesterday. It was
24 very windy, so at least I've experienced that.

25 MR. VAN DAM: So I'm just east of it. It blows

1 90 percent of the time on the east side, from the west
2 to the east. There's a lot of dairy cattle out there
3 and they don't do real good with dust. So that's a
4 major concern of mine.

5 And probably the town council, if the
6 project did go through, I'd also recommend the screening
7 and the trees, just because of -- well, the screening
8 will kind of control some of the dust as it fell
9 underneath the panels, it will keep some of that dust
10 down. So that might be something that could be worked
11 out.

12 Are you guys against that or screening
13 and trees?

14 MR. CURZI: By screening like a fabric?

15 MR. VAN DAM: Geo screen fabric.

16 MR. CURZI: No, we're open to that. In fact,
17 during construction we would require some softer fabric
18 over the fence. In past projects, we required that over
19 the fence, but during construction then we would do it
20 afterwards.

21 MR. VAN DAM: What do you mean over the fence?

22 MR. CURZI: I guess on the fence, the fabric.

23 MR. VAN DAM: Right.

24 MR. CURZI: Kind of covering the whole fence.

25 MR. VAN DAM: That's what we're talking about.

1 From the ground?

2 MR. CURZI: Right, higher than the fence.

3 MR. VAN DAM: Yeah, the fence will be 8-foot?

4 MR. CURZI: Right. Six feet with one to two feet
5 of barbed wire to cover the whole thing.

6 MR. VAN DAM: That in itself will contain some the
7 dust, okay.

8 And that's it for now.

9 MR. McCARTHY: If you could fill out one of the
10 forms that looks like this and give it to the secretary
11 in the back for me.

12 MR. VAN DAM: Okay.

13 MR. McCARTHY: Were you sworn in?

14 MR. VAN DAM: No.

15 MR. McCARTHY: Please stand and raise your right
16 hand.

17 Do you solemnly state or affirm that the
18 testimony you may give in the cause now pending before
19 this hearing shall be the truth, the whole truth, and
20 nothing but the truth so help you?

21 MR. VAN DAM: Yes.

22 MR. McCARTHY: Please be seated.

23 MR. STONER: I apologize for being late.

24 MR. McCARTHY: We need your name.

25 MR. STONER: My name is Daniel Stoner, S-T-O-N-E-R.

1 And I'm opposed to the solar project
2 because of what I've seen around the Antelope Valley
3 with the other projects. I imagine this will probably
4 be a typical project where someone from probably far
5 away comes in, builds their project. And when they
6 leave, it's a mess. It's clean for a while.

7 They're not going to do the dust
8 mitigation that they promise. They're going to plant
9 some weedy looking things around the fence and in
10 six-months or a year's time, all those plants that they
11 put around the fence that are supposed to mitigate the
12 eyesore factor are going to be dead.

13 And I don't know what benefit it is to
14 the folks that are nearby and I -- I don't know the
15 folks that live next to this proposed project, but I
16 imagine they're not too pleased with it at best because
17 that's all that could do to their property is bring the
18 property value down.

19 It won't really personally affect me in
20 the near future, and another one coming in and getting
21 closer and closer to my place. I didn't move into this
22 area for that, I cam from the incorporated area of
23 Lancaster about eight years ago and I came here to get
24 away from all the rift of that stuff. The quiet country
25 life and a view of the horizon, and that's not what I

1 came out here for.

2 MR. CHILD: Thank you. Do you have anything else
3 besides that?

4 MR. STONER: I do not.

5 MR. CHILD: There is a gentleman here from the
6 company who's proposing this project. You might want to
7 see him. He is going to spend -- you probably didn't
8 see the presentation that we gave so he'll show it for
9 you.

10 MR. MCCARTHY: If you can fill out the speaker card
11 on the way out over there.

12 But if there's nobody else that wishes to
13 speak, we will conclude the meeting. We do have one
14 other part under the Agenda which is part 3, Public
15 Comment, which allows anybody to take us up on any item
16 not related not to the item on the agenda.

17 Does anybody want to make public
18 comments, please plan to do so.

19 Seeing none, then we will adjourn this
20 meeting. Thank you for coming this evening.

21

22 (Proceeding Concluded at 6:26 p.m.)

23

24

25

1 FOR THE COUNTY OF LOS ANGELES

2
3
4 REPORTER'S CERTIFICATE

5
6 I, PEGGY DOWNS, OFFICIAL REPORTER FOR THE
7 STATE OF CALIFORNIA, FOR THE COUNTY OF LOS ANGELES,
8 DO HEREBY CERTIFY THAT THE FOREGOING PAGES 1 THROUGH
9 59 COMPRISE A FULL, TRUE AND CORRECT TRANSCRIPT OF
10 THE PROCEEDINGS HELD IN THE ABOVE-ENTITLED CAUSE ON
11 DECEMBER 11, 2014.

12
13 DATED THIS 22ND DAY OF DECEMBER, 2014.

14
15 _____
16 PEGGY DOWNS, CSR #11965
17 OFFICIAL REPORTER
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